

Facility ID: 1413010362 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

- [Go to Part II for Emissions Unit K001](#)
- [Go to Part II for Emissions Unit K002](#)
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Facility ID: 1413010362 Emissions Unit ID: K001 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K001 - Automotive style paint booth	OAC rule 3745-31-05(A)(3) PTI 14-05865	VOC emissions shall not exceed 2.84 pounds per hour excluding cleanup and 4.63 tons per year including cleanup. See terms A.2.a and A.2.b. See sections B.1 and B.2.
	OAC rule 3745-21-09(U)(2)(d) ORC rule 3704(F)(4)(d)	Exempt See section C.2.

2. Additional Terms and Conditions

- (a) The volatile organic compound (VOC) content of each coating employed in this emissions unit shall not exceed 6.75 pounds of VOC per gallon of coating, as applied. The volatile organic compound (VOC) content of each cleanup material employed in this emissions unit shall not exceed 7.1 pounds of VOC per gallon of cleanup material, as applied. The hourly emission limitation outlined is based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with this limitation. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by coating and cleanup material usage restrictions, the VOC content limitations, emissions limitations, and compliance with the Air Toxics Policy.

B. Operational Restrictions

1. The maximum annual coating usage for this emissions unit shall not exceed 1040 gallons.
2. The maximum annual cleanup material usage for this emissions unit shall not exceed 313 gallons.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month:
 - a. The name and identification number of each coating and cleanup material employed.
 - b. The volume, in gallons, of each coating employed.
 - c. The VOC content of each coating in pounds per gallon, as applied
 - d. The total volume, in gallons, of each cleanup material employed.
 - e. The VOC content of each cleanup material in pounds per gallon.
 - f. The total VOC emissions rate for all coatings and cleanup materials employed, in pounds per month [(b x c) + (d x e)].

These records shall be summarized at the end of the calendar year to demonstrate compliance with the

annual VOC emission rate.

2. The permit to install for emissions unit K001 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Styrene

TLV (ug/m3): 85,200

Maximum Hourly Emission Rate (lbs/hr): 2.84

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 209.5

MAGLC (ug/m3): 2028.6

The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(d), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

The permittee shall submit annual reports that describe any changes to this emissions unit which affect the air toxic modeling. If no changes were made during the year, then a report shall be submitted stating that no changes were made. This report is due by January 31 of each year and shall cover the previous calendar year.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any record showing the use of noncomplying coatings and/or cleanup materials (i.e., for VOC contents) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days following the end of the calendar month.
2. The permittee shall submit annual reports which summarize the following for this emissions unit:
 - a. The total VOC emissions from coatings and cleanup materials employed in this emissions unit for the previous calendar year.
 - b. The total number of gallons of coatings employed in this emissions unit for the previous calendar year.
 - c. The total number of gallons of cleanup materials employed in this emissions unit for the previous calendar year.

The reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following method:

Emission Limitations:
Volatile Organic Compound (VOC) emissions shall not exceed 2.84 pounds per hour and 4.63 TPY.

Applicable Compliance Method:
Compliance with the hourly limitation is determined by multiplying the maximum hourly coating usage of 0.42 gallons/hour by the maximum coating VOC content of 6.75 pounds/gallon.

Compliance with the annual limitation is determined by the record keeping in section C.1.
2. Compliance with the VOC content limitations in terms A.2.a and A.2.b shall be based upon the record keeping requirements as specified in section C.1.
3. USEPA methods 24 and 24A shall be used to determine the VOC content for (a) coatings and (b) flexographic and rotogravure printing lines and related coatings, respectively. If, pursuant to 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.
4. Compliance with the usage limitations in sections B.1 and B.2 shall be based upon the record keeping as

specified in section C.1.

F. Miscellaneous Requirements

- 1. None

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Facility ID: 1413010362 Emissions Unit ID: K002 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

- 1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
- 2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
(K002) - Automotive Refinishing Primer Coating Booth	OAC rule 3745-31-02(A)(2) PTI 14-05865	The VOC emissions shall not exceed 3.8 tons per year including cleanup. See terms A.2.a, A.2.b and A.2.c. See sections B1 and B2.
	OAC rule 3745-21-09(U)(2)(c)	Exempt.

2. Additional Terms and Conditions

- (a) The volatile organic compound (VOC) content of each coating employed in this emissions unit shall not exceed 5.0 pounds of VOC per gallon of coating, as applied. The volatile organic compound (VOC) content of each cleanup material employed in this emissions unit shall not exceed 7.1 pounds of VOC per gallon of cleanup material. Permit to Install 14-05865 for this air contaminant source takes into account the following voluntary restrictions(including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):
 - i. VOC content limits outlined in terms A.2.a and A.2.b; and
 - ii. The gallon usage limits outlined in sections B.1 and B.2.

B. Operational Restrictions

- 1. The maximum annual coating usage for this emissions unit shall not exceed 1281 gallons.
- 2. The maximum annual cleanup material usage for this emissions unit shall not exceed 172 gallons.

C. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall collect and record the following information each month:
 - a. The name and identification number of each coating and cleanup material employed.
 - b. The volume, in gallons, of each coating employed.
 - c. The VOC content of each coating in pounds per gallon, as applied
 - d. The total volume, in gallons, of each cleanup material employed.
 - e. The VOC content of each cleanup material in pounds per gallon.
 - f. The total VOC emissions rate for all coatings and cleanup materials employed, in pounds per month [(b x c) + (d x e)].

These records shall be summarized at the end of the calendar year to demonstrate compliance with the annual VOC emission rate.

2. The permit to install for emissions unit K002 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Styrene

TLV (ug/m3): 85,200

Maximum Hourly Emission Rate (lbs/hr): 2.55

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 315.6

MAGLC (ug/m3): 2028.6

The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(d), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

The permittee shall submit annual reports that describe any changes to this emissions unit which affect the air toxic modeling. If no changes were made during the year, then a report shall be submitted stating that no changes were made. This report is due by January 31 of each year and shall cover the previous calendar year.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any record showing the use of noncomplying coatings and/or cleanup materials (i.e., for VOC contents) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days following the end of the calendar month.
2. The permittee shall submit annual reports which summarize the following for this emissions unit:
 - a. The total VOC emissions from coatings and cleanup materials employed in this emissions unit for the previous calendar year.
 - b. The total number of gallons of coatings employed in this emissions unit for the previous calendar year.
 - c. The total number of gallons of cleanup materials employed in this emissions unit for the previous calendar year.

The reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following method:

Emission Limitations:
Volatile Organic Compound (VOC) emissions shall not exceed 3.8 TPY.

Applicable Compliance Method:
Compliance with the annual limitation is determined by the record keeping in section C.1.
2. Compliance with the VOC content limitations in terms A.2.a and A.2.b shall be based upon the record keeping requirements as specified in section C.1.
3. USEPA methods 24 and 24A shall be used to determine the VOC content for (a) coatings and (b) flexographic and rotogravure printing lines and related coatings, respectively. If, pursuant to 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.
4. Compliance with the usage limitations in sections B.1 and B.2 shall be based upon the record keeping as specified in section C.1.

F. Miscellaneous Requirements

1. None

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Facility ID: 1413010362 Emissions Unit ID: K003 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
(K003) - Automotive Style Paint Booth	OAC rule 3745-31-02(A)(2) PTI 14-05865	VOC emissions shall not exceed 4.63 tons per year including cleanup
	OAC rule 3745-21-09(U)(2)(d)	See terms A.2.a, A.2.b, A.2.c, B.1 and B.2 Exempt.

2. Additional Terms and Conditions

- (a) The volatile organic compound (VOC) content of each coating employed in this emissions unit shall not exceed 6.75 pounds of VOC per gallon of coating, as applied.
The volatile organic compound (VOC) content of each cleanup material employed in this emissions unit shall not exceed 7.1 pounds of VOC per gallon of cleanup material.
Permit to Install 14-05865 for this air contaminant source takes into account the following voluntary restrictions(including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):
 - i. VOC content limits outlined in terms A.2.a and A.2.b; and
 - ii. The gallon usage limits outlined in terms B.1 and B.2.

B. Operational Restrictions

1. The maximum annual coating usage for this emissions unit shall not exceed 1040 gallons.
2. The maximum annual cleanup material usage for this emissions unit shall not exceed 313 gallons.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month:
 - a. The name and identification number of each coating and cleanup material employed.
 - b. The volume, in gallons, of each coating employed.
 - c. The VOC content of each coating in pounds per gallon, as applied
 - d. The total volume, in gallons, of each cleanup material employed.
 - e. The VOC content of each cleanup material in pounds per gallon.
 - f. The total VOC emissions rate for all coatings and cleanup materials employed, in pounds per month [(b x c) + (d x e)].

These records shall be summarized at the end of the calendar year to demonstrate compliance with the annual VOC emission rate.
2. The permit to install for emissions unit K003 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model

or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Styrene

TLV (ug/m3): 85,200

Maximum Hourly Emission Rate (lbs/hr): 2.84

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 209.5

MAGLC (ug/m3): 2028.6

The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(d), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

The permittee shall submit annual reports that describe any changes to this emissions unit which affect the air toxic modeling. If no changes were made during the year, then a report shall be submitted stating that no changes were made. This report is due by January 31 of each year and shall cover the previous calendar year.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any record showing the use of noncomplying coatings and/or cleanup materials (i.e., for VOC contents) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days following the end of the calendar month.
2. The permittee shall submit annual reports which summarize the following for this emissions unit:
 - a. The total VOC emissions from coatings and cleanup materials employed in this emissions unit for the previous calendar year.
 - b. The total number of gallons of coatings employed in this emissions unit for the previous calendar year.
 - c. The total number of gallons of cleanup materials employed in this emissions unit for the previous calendar year.

The reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following method:

Emission Limitations:
Volatile Organic Compound (VOC) emissions shall not exceed 4.63 TPY.

Applicable Compliance Method:
Compliance with the annual limitation is determined by the record keeping in section C.1.
2. Compliance with the VOC content limitations in terms A.2.a and A.2.b shall be based upon the record keeping requirements as specified in section C.1.
3. USEPA methods 24 and 24A shall be used to determine the VOC content for (a) coatings and (b) flexographic and rotogravure printing lines and related coatings, respectively. If, pursuant to 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.
4. Compliance with the usage limitations in sections B.1 and B.2 shall be based upon the record keeping as specified in section C.1.

F. Miscellaneous Requirements

1. None

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Facility ID: 1413010362 Emissions Unit ID: K004 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
(K004) - Subassembly operations station	ORC 3704.03(T)(4) PTI 14-05865 OAC rule 3745-21-07(G)(2)	See term A.2.a. Exempt from regulation. See term A.2.b.

2. Additional Terms and Conditions

- (a) The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the volatile organic compound (VOC) emissions from this air contaminant source since the uncontrolled potential to emit for VOC emissions is less than ten tons per year. PTI Application 14-05865 includes information regarding materials not classified as "photochemically reactive materials" as defined in OAC rule 3745-21-01(C)(5). While the use of photochemically reactive materials in this emissions unit is not prohibited, any use of such materials would make this emissions unit subject to the federally enforceable rule limits under OAC rule 3745-21-07(G)(2).

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain documentation on whether or not each coating and organic cleanup material is a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5).

[Note: The definitions of "photochemically reactive" and "non-photochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

2. The permit to install for emissions unit K004 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene

TLV (ug/m3): 188,404

Maximum Hourly Emission Rate (lbs/hr): 1.85

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3738

MAGLC (ug/m3): 4486

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously

- modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
- D. Reporting Requirements**
1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any record showing the use of photochemically reactive materials as defined in OAC rule 3745-21-01(C)(5). The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days of the occurrence.
- E. Testing Requirements**
1. The uncontrolled potential to emit VOC emissions for this emissions unit is based on the following information, as supplied by the facility, in PTI Application 14-05844:

(6.16 lb/gal of VOC from coatings x 0.30 gal/hr x 8760 hr/year x ton/2000 lbs) + (6.93 lb/gal of VOC from cleanups x 55 gal/year x year/2500 hrs x 8760 hrs/year x ton/2000 lbs) = 8.76 TPY of VOC.
- F. Miscellaneous Requirements**
1. None