

Facility ID: 1413010505 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.

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Facility ID: 1413010505 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) - Automatic Paint Spray Booth | OAC rule 3745-31-05(A)(3) 14-05976 | Volatile Organic Compound (VOC) emissions shall not exceed 8.75 pounds per hour from coating usage only. VOC emissions shall not exceed 7.44 tons per year from coatings and cleanup material usage. See terms A.2.a, A.2.b, B.1 and B.2. The requirements of this rule also includes compliance with the requirements of OAC rule 3745-21-09(U)(1)(d). |
| | OAC rule 3745-21-09(U)(1)(d) | See term A.2.c. |

2. Additional Terms and Conditions

- (a) Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by coating and cleanup material usage restrictions, the VOC content limitations and emission limitations.
 The VOC content of each cleanup material shall not exceed 6.75 pounds of VOC per gallon.
 The VOC content of the coatings employed shall not exceed 3.5 pounds per gallon, as applied, excluding water and exempt solvents.
 The hourly emission limitations outlined for VOC are based upon the emissions unit's potential to emit. Therefore, no hourly records are required to demonstrate compliance with this limitation.

B. Operational Restrictions

1. The maximum coating usage for this emissions unit shall not exceed 3650 gallons per year as applied, excluding water and exempt solvents.
2. The maximum cleanup material usage for this emissions unit shall not exceed 310 gallons per year.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for emissions unit K001:
 - The name and identification number of each coating, as applied.
 - The VOC content of each coating, in pounds per gallon as applied, excluding water and exempt solvents.
 - The volume of each coating employed, in gallons, excluding water and exempt solvents.
 - The total volume of all coatings employed, in gallons, excluding water and exempt solvents.
 - The name and identification number of each cleanup material employed.
 - The VOC content of each cleanup material, in pounds per gallon.
 - The volume of each cleanup material employed, in gallons.
 - The total volume of all cleanup materials employed, in gallons.
 - The total VOC emissions from all coatings employed (b x c).
 - The total VOC emissions from all cleanup materials employed (f x g).
 - The total VOC emissions from all coatings and cleanup materials employed, in pounds [(b x c) + (f x g)].

These records shall be summarized at the end of the calendar year.

D. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services of any annual record showing that emissions unit K001 employed more than the applicable maximum annual coating or cleanup material usage limitation outlined in terms and conditions B.1 and B.2. A copy of such record shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurred. For each usage limit exceedance the permittee shall also identify if an exceedance of the applicable annual VOC emissions limitation occurred.
2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month in which the use of noncomplying coatings was recorded.
3. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit unless otherwise specified.

E. Testing Requirements

1. USEPA methods 24 and 24A shall be used to determine the VOC content for coatings and cleanup materials. If pursuant to 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating or cleanup material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

2. Compliance with the emission limitations in Section A and usage limitations in Section B of these terms and conditions shall be determined in accordance with the following method(s):
Emission Limitation:

VOC emissions shall not exceed 8.75 pounds per hour from coating usage only

Applicable Compliance Method:

The hourly VOC emission limitation from coatings usage only shall be demonstrated by the use of following equation:

Hourly VOC Emission = A x B; where:

A = Allowable VOC content of the coatings, as applied (3.5 pounds per gallon).

B = Maximum hourly coating usage rate (2.5 gallons per hour).

Emission Limitation:

VOC emissions shall not exceed 7.44 tons per year including coatings and cleanup materials.

Applicable Compliance Method:

The annual VOC emission limitation from coating and cleanup materials usage shall be demonstrated by the use of following equation:

Annual VOC Emission = (A x B x 0.0005) + (C x D x 0.0005);

where:

A = Actual VOC content of the coatings (3.5 pounds per gallon)

B = Actual coating use (3650 gallons per year)

C = Actual VOC content of the cleanup material (6.75 pounds per gallon)

D = Actual cleanup material use (310 gallons per year)

0.0005 is the conversion factor for pounds to tons.

Compliance shall be based upon the record keeping requirements as specified in term and condition C.1.

Usage Limitations:

3650 gallons as applied, excluding water and exempt solvents per year, of coatings; and 310 gallons per year, of cleanup materials.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements as specified in term and condition C.1.

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic pollutant will be less than 1.0 ton. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that a new permit to install application would be required for an emissions unit if changes in the composition of the materials or use of new materials would cause the emissions of any pollutant that has a listed Threshold Limit Value (TLV), 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"), to increase to above 1.0 ton per year.

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Facility ID: 1413010505 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) - Manual Paint Spray Booth | OAC rule 3745-31-05(A)(3) 14-05976 | <p>Volatile Organic Compound (VOC) emissions shall not exceed 8.75 pounds per hour from coating usage only.</p> <p>VOC emissions shall not exceed 7.44 tons per year from coatings and cleanup material usage.</p> <p>See terms A.2.a, A.2.b, B.1 and B.2.</p> <p>The requirements of this rule also includes compliance with the requirements of OAC rule 3745-21-09(U)(1)(d).</p> |
| | OAC rule 3745-21-09(U)(1)(d) | See term A.2.c. |

2. **Additional Terms and Conditions**
 - (a) Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by coating and cleanup material usage restrictions, the VOC content limitations and emission limitations.
 - The VOC content of each cleanup material shall not exceed 6.75 pounds of VOC per gallon.
 - The VOC content of the coatings employed shall not exceed 3.5 pounds per gallon, as applied, excluding water and exempt solvents.
 - The hourly emission limitations outlined for VOC are based upon the emissions unit's potential to emit. Therefore, no hourly records are required to demonstrate compliance with this limitation.

B. Operational Restrictions

1. The maximum coating usage for this emissions unit shall not exceed 3650 gallons per year as applied, excluding water and exempt solvents.
2. The maximum cleanup material usage for this emissions unit shall not exceed 310 gallons per year.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for emissions unit K002:
 - The name and identification number of each coating, as applied.
 - The VOC content of each coating, in pounds per gallon as applied, excluding water and exempt solvents.
 - The volume of each coating employed, in gallons, excluding water and exempt solvents.
 - The total volume of all coatings employed, in gallons, excluding water and exempt solvents.
 - The name and identification number of each cleanup material employed.
 - The VOC content of each cleanup material, in pounds per gallon.
 - The volume of each cleanup material employed, in gallons.
 - The total volume of all cleanup materials employed, in gallons.
 - The total VOC emissions from all coatings employed (b x c).
 - The total VOC emissions from all cleanup materials employed (f x g).
 - The total VOC emissions from all coatings and cleanup materials employed, in pounds [(b x c) + (f x g)].

These records shall be summarized at the end of the calendar year.

D. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services of any annual record showing that emissions unit K002 employed more than the applicable maximum annual coating or cleanup material usage limitation outlined in terms and conditions B.1. and B.2. A copy of such record shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurred. For each usage limit exceedance the permittee shall also identify if an exceedance of the applicable annual VOC

emissions limitation occurred.

2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month in which the use of noncomplying coatings was recorded.
3. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit unless otherwise specified.

E. Testing Requirements

1. USEPA methods 24 and 24A shall be used to determine the VOC content for coatings and cleanup materials. If pursuant to 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating or cleanup material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

2. Compliance with the emission limitations in Section A and usage limitations in Section B of these terms and conditions shall be determined in accordance with the following method(s):

Emission Limitation:

VOC emissions shall not exceed 8.75 pounds per hour from coating usage only

Applicable Compliance Method:

The hourly VOC emission limitation from coatings usage only shall be demonstrated by the use of following equation:

Hourly VOC Emission = A x B; where:

A = Allowable VOC content of the coatings, as applied (3.5 pounds per gallon)

B = Maximum hourly coating usage rate (2.5 gallons per hour)

Emission Limitation:

VOC emissions shall not exceed 7.44 tons per year including coatings and cleanup materials.

Applicable Compliance Method:

The annual VOC emission limitation from coating and cleanup materials usage shall be demonstrated by the use of following equation:

Annual VOC Emission = (A x B x 0.0005) + (C x D x 0.0005);

where:

A = Actual VOC content of the coatings (3.5 pounds per gallon)

B = Actual coating use (3650 gallons per year)

C = Actual VOC content of the cleanup material (6.75 pounds per gallon)

D = Actual cleanup material use (310 gallons per year)

0.0005 is the conversion factor for pounds to tons.

Compliance shall be based upon the record keeping requirements as specified in term and condition C.1.

Usage Limitations:

3650 gallons as applied, excluding water and exempt solvents per year, of coatings; and 310 gallons per year, of cleanup materials.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements as specified in term and condition C.1.

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic pollutant will be less than 1.0 ton. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that a new permit to install application would be required for an emissions unit if changes in the composition of the materials or use of new materials would cause the emissions of any pollutant that has a listed Threshold Limit Value (TLV), 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"), to increase to above 1.0 ton per year.

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Facility ID: 1413010505 Emissions Unit ID: N001 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> |
|---|--|---|
| (N001) - Burn-off Oven | OAC rule 3745-31-05(A)(3)(b) 14-05976 | See term and condition A.2.a. |
| | OAC rule 3745-31-05(C) | See term and condition A.2.b. |
| | OAC rule 3745-17-07(A)(1) | Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six minute average. |
| | OAC rule 3745-17-09(B) | The particulate emissions shall not exceed 0.10 lb per 100 lb of charged material. |
| | OAC rule 3745-18-06(C) | Exempted based on process weight rate less than 1000 lb/hr. |

2. Additional Terms and Conditions

- (a) The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to particulate emissions (PE), particulate matter 10 microns and less in diameter (PM-10) emissions, SO2 emissions, NOx emissions and VOC emissions from this air contaminant source since the total uncontrolled potential to emit for PE, PM10, SO2, NOx and VOC emissions is less than 10 tons per year.
 Permit to Install 14-05976 for this air contaminant source takes into account the following voluntary restrictions as proposed by the permittee for the purpose of avoiding Best Available technology (BAT) under OAC rule 3745-31-05(A)(3):
 - i. for Carbon Monoxide (CO) emissions: the permittee shall use an afterburner at all times while this emissions unit is in operation to ensure the controlled potential to emit is less than 10.0 tons per year of CO.
 The hourly and annual limitations are based on the emissions unit's potential to emit. Therefore, no monitoring, recordkeeping and reporting requirements are necessary to ensure on-going compliance with these emission limitations.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
2. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving the emissions unit. The presence or absence of any visible emissions shall be noted in an operation log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted to the Hamilton County Department of Environmental Services within 30 days after the deviation occurs.
2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Hamilton County

Department of Environmental Services by January 31 and July 31 of each year and shall cover the previous 6-month periods.

E. Testing Requirements

1. Compliance with the Applicable Emission Limitations in Section A.1 of these Terms and Conditions shall be determined in accordance with the following methods:
Emission Limitation

The controlled potential to emit for CO emissions is less than 10.0 tons per year.

Applicable Compliance Method

Emissions shall be calculated and compliance determined by using the following equations:

tons per year emissions = $A * B * C$; where:

A = pound per hour emission rate for CO based on the emission test data as provided to the facility by the manufacturer in air permit to install 14-05976 submitted on August 10, 2007 which is as follows:

Pollutant Emission rate, lb/hr

CO 0.05

B = 8760 hours per year

C = 0.0005 ton per pounds.

Emission Limitation:

The uncontrolled potential to emit for PE, PM-10, SO₂, NO_x and VOC emissions is less than 10.0 tons per year.

Application Compliance Method:

Emissions shall be calculated and compliance determined by using the following equations:

tons per year emissions = $A * B * C$; where:

A = pound per hour emission rate for each pollutant based on the emission test data as provided to the facility by the manufacturer in air permit to install 14-05976 submitted on August 10, 2007 which is as follows:

Pollutant Emission rate, lb/hr

PE/PM-10 0.0133

NO_x 0.0271

SO₂ 0.0018

VOC 0.0174

B = 8760 hours per year

C = 0.0005 ton per pounds

Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity as a six-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

F. Miscellaneous Requirements

1. None