

Facility ID: 1413020232 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: 1413020232 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 - Surface Coating Operation for Metal Parts	OAC rule 3745-31-02(A)(2) (PTI 14-05753)	Volatile Organic Compound (VOC) emissions shall not exceed 432 lbs/day and 78.84 TPY, based upon a rolling, 12-month summation. See term A.2.c.
		See section B.1.
	OAC rule 3745-21-09(U)(1)(b) OAC rule 3745-21-09(U)(1)(c)	See term A.2.b. See term A.2.a.

2. Additional Terms and Conditions

- (a) The VOC content, as applied, of each extreme performance coating employed in this emissions unit shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.
 The VOC content, as applied, of each zinc rich primer coating employed in this emissions unit shall not exceed 4.0 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.
 The total allowable emissions of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from emissions units K001 (Miscellaneous Metal Parts Coating Operation), P002 (Solvent Wipe Cleaning Operation), all de minimus emissions units (as defined in OAC rule 3745-15-05), all emissions units exempt from the requirement to obtain a permit to install pursuant to OAC rule 3745-31-03 currently, and future to-be-installed air contaminant sources, combined, shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation. The permittee has existing records to demonstrate compliance with this limitation upon issuance of this permit.

B. Operational Restrictions

1. The maximum daily VOC input of coatings employed in emissions unit K001 shall not exceed 432 pounds per day, as applied. The maximum annual VOC input of coatings employed in emissions unit K001 shall not exceed 157,680 pounds per year based upon a rolling, 12-month summation, as applied. The VOC input shall be determined by multiplying the number of gallons of coating employed per month by the VOC content of each coating, in pounds per gallon, as applied. The VOC input rate of coatings employed is based upon the premise that 100% of the solvent contained within the coatings is emitted. The permittee has existing records to demonstrate compliance with this limit upon issuance of this permit.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for this emissions unit:
 - a. the company identification of each coating, as applied;
 - b. the VOC content (in pounds of VOC/gallon) of each coating (excluding water and exempt solvents), as applied;
 - c. the number of gallons of each coating material employed (excluding water and exempt solvents);
 - d. the total VOC (VOC input), in pounds or ton [summation of (b x c) for all coating materials]. If in pounds the

value in d. shall be divided by 2000 pounds/ton;

- e. the updated rolling, 12-month summation of the VOC (VOC input) in tons;
 - f. the total VOC emissions, in pounds or ton [summation of (b x c) for all coating materials]; and
 - g. the updated rolling, 12-month summation of the VOC emissions in tons.
2. The permittee shall collect and record the following information each month for emissions units K001 and P002:
- a. the name and identification number of each coating, employed;
 - b. the individual Hazardous Air Pollutant (HAP1) content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
 - c. the total combined HAP1 content of each coating in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (b)];
 - d. the number of gallons of each coating employed;
 - e. the name and identification of each cleanup material employed;
 - f. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;
 - g. the total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied [sum all the individual HAP contents from (f)];
 - h. the number of gallons of each cleanup material employed;
 - i. the total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each coating plus the sum of (f) times (h) for each cleanup material];
 - j. the total combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material];
 - k. the updated rolling, 12-month summation of emissions for each individual HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
 - l. the updated rolling, 12-month summation of emissions for total combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
- 1 A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a individual emissions unit basis.

3. The permittee shall collect and record the following information each day for this emissions unit:
- a. the name and identification number of each coating, as applied;
 - b. the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied;
 - c. the daily volume-weighted average VOC content of all zinc rich primer coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2;
 - d. the daily volume-weighted average VOC content of all extreme performance coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2;
 - e. the total VOC (VOC input), in pounds [summation of (b x c + b x d) for all coating materials]; and
 - f. the total VOC emissions, in pounds [summation of (b x c + b x d) for all coating materials].

D. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of any noncomplying coatings (i.e. VOC contents) and/or daily VOC emission limitation. 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.
2. The permittee shall submit deviation reports which identify any exceedance of the HAP emission limitations set forth in term and condition A.2.c. If no exceedances occurred, the permittee shall state so in the report.
3. The permittee shall submit deviation reports which identify any exceedance of the VOC input and VOC mass emission limitations set forth in terms and conditions B.1 and A.1, respectively. If no exceedances occurred, the permittee shall state so in the report.
4. Unless otherwise noted in the above terms, the deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.
5. The permittee shall submit annual reports that specify the total VOC emissions for this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Compliance with the emission limitations in the terms and conditions of this permit shall be determined in accordance with the following method(s):

- a. Emission Limitation:
Volatile organic compound (VOC) emissions shall not exceed 432 lbs/day and 78.84 TPY, based upon a rolling, 12-month summation.

Applicable Compliance Method:
Compliance with the VOC emission limitations shall be determined by the record keeping requirements specified in terms and conditions C.1 and C.3 of this permit. Compliance with the annual VOC emission limitation is determined by summing the monthly VOC emissions.

- b. Emission Limitation:
The VOC content, as applied, of each extreme performance coating employed in this emissions unit shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.
The VOC content, as applied, of each zinc rich primer coating employed in this emissions unit shall not exceed 4.0 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.

Applicable Compliance Method:
Compliance shall be determined by the record keeping requirements specified in term and condition C.1 of this permit. 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 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.

- c. Emission Limitation:
9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs.

Applicable Compliance Method:
Compliance shall be demonstrated by the record keeping in term and condition C.2.

F. Miscellaneous Requirements

- 1. The following terms and conditions of this permit are federally enforceable: A, B, C, D and E.

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Facility ID: 1413020232 Emissions Unit ID: P002 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>
P002 - Solvent Wipe Operation	OAC rule 3745-31-05(A)(3) (PTI 14-05753)	Volatile Organic Compound (VOC) emissions shall not exceed 112 lbs/day and 20.44 TPY, based upon a rolling, 12-month summation. See term A.2.b. See sections B.1 and B.2.
	OAC rule 3745-31-05(C) OAC rule 3745-21-07(G)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C). See term A.2.a. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). See section B.3.

- 2. **Additional Terms and Conditions**

- (a) The total allowable emissions of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from emissions units K001 (Miscellaneous Metal Parts Coating Operation), P002 (Solvent Wipe Cleaning Operation), all de minimus emissions units (as defined in OAC rule 3745-15-05), all emissions units exempt from the requirement to obtain a permit to install pursuant to OAC rule 3745-31-03 currently, and future to-be-installed air contaminant sources, combined, shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitation shall be based on a rolling, 12-month summation. The permittee has existing records to demonstrate compliance with this limitation upon issuance of this permit.
The VOC content of each cleanup material employed in this emissions unit shall not exceed 8.0 lbs/gallon.
Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the usage and emission limitations.

B. Operational Restrictions

1. The maximum amount of cleanup material employed in this emissions unit shall not exceed 5110 gallons/year based upon a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance with this limit upon issuance of this permit.
2. The permittee shall store all liquid organic material laden rags in a closed container.
3. The use of photochemically reactive material as defined in OAC rule 3745-21-01(C)(5) is prohibited.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for this emissions unit:
 - a. the company identification of each liquid organic cleanup material employed;
 - b. the VOC content (in pounds of VOC/gallon) of each cleanup material employed;
 - c. the number of gallons of each cleanup material employed;
 - d. the total VOC emissions, in pounds [summation of (b x c) for all cleanup materials] for each calendar month;
 - e. the updated rolling, 12-month summation of the gallons of cleanup material employed;
 - f. the updated rolling, 12-month summation of the VOC emissions, in tons; and
 - g. 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).
2. The permittee shall collect and record the following information each month for emissions units K001 and P002:
 - a. the name and identification number of each coating, employed;
 - b. the individual Hazardous Air Pollutant (HAP1) content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
 - c. the total combined HAP1 content of each coating in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (b)];
 - d. the number of gallons of each coating employed;
 - e. the name and identification of each cleanup material employed;
 - f. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;
 - g. the total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied [sum all the individual HAP contents from (f)];
 - h. the number of gallons of each cleanup material employed;
 - i. the total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each coating plus the sum of (f) times (h) for each cleanup material];
 - j. the total combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material];
 - k. the updated rolling, 12-month summation of emissions for each individual HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
 - l. the updated rolling, 12-month summation of emissions for total combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

1 A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a individual emissions unit basis.
3. The permit to install for this emissions unit P002 was evaluated based on the actual materials (typically coatings and cleanup 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 for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

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

Pollutant: Methyl Ethyl Ketone
 TLV (ug/m3): 590,000
 Maximum Hourly Emission Rate (lbs/hr): 8.00
 Predicted 1-Hour Maximum Ground-Level
 Concentration (ug/m3): 579.4
 MAGLC (ug/m3): 14,048

Physical changes to or in the method of operation of the emissions unit after it's installation or modification could affect the parameters used to determine whether or not the "Air Toxics 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 the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- 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) is (are) defined as a modification under other provisions of the modification definition, 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 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 it's evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. when the 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.

4. The permittee shall collect and record the following information each day for this emissions unit:
 - a. The name and identification number of each cleanup material, as applied.
 - b. The VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each cleanup material, as applied.
 - c. The daily volume-weighted average VOC content of all cleanup materials, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.
 - d. The total VOC emissions, in pounds [summation of (b x c) for all cleanup materials].

D. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of any noncomplying cleanup materials (i.e. VOC contents) and/or any exceedance of the daily emission limitation. 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.
2. The permittee shall submit deviation reports which identify any exceedance of the HAP emission limitations set forth in term and condition A.2.a. If no exceedances occurred, the permittee shall state so in the report.
3. The permittee shall submit deviation reports which identify any exceedance of the rolling, 12-month gallon usage limitation in term and condition B.1 and/or the VOC mass emission limitations set forth in term and condition A.1. If no exceedances occurred, the permittee shall state so in the report.
4. Unless otherwise noted in the above terms, the deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.
5. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit. This report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of material(s) emitted each such day. This report shall be submitted to the Hamilton County Department of Environmental Services within 30 days after the exceedance occurs.

E. Testing Requirements

1. Compliance with the emission limitations in the terms and conditions of this permit shall be determined in accordance with the following method(s):

a. Emission Limitation:

Volatile Organic Compound (VOC) emissions shall not exceed 112 lbs/day and 20.44 TPY, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the VOC emission limitations shall be determined by the record keeping requirements specified in sections C.1 and C.4 of this permit. Compliance with the annual VOC emission limitation is determined by summing the monthly VOC emissions.

b. Emission Limitation:

The VOC content of each cleanup material employed in this emissions unit shall not exceed 8.0 lbs/gallon.

Applicable Compliance Method:

Compliance shall be determined by the record keeping requirements specified in section C.1 of this permit. 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.

c. Emission Limitation:

The maximum amount of cleanup material employed in this emissions unit shall not exceed 5110 gallons/year based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the material usage limitation shall be determined by the record keeping requirements specified in section C.1 of this permit.

d. Emission Limitation:

9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs.

Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping in section C.2.

2. Compliance with the operational restriction in section B.3 shall be demonstrated by the record keeping in section C.1.

F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A, B, C.1, C.2, C.4, D and E.