

Facility ID: 1413020443 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.

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

Facility ID: 1413020443 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>
misc. metal parts paint booth	OAC rule 3745-31-05(A)(3) (PTI # 14-05011)	28.35 pounds VOC/day including cleanup 2.36 TPY VOC including cleanup  The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1) (d).  See A.2.
	OAC rule 3745-21-09(U)(1)(d)	See A.2.b.

**2. Additional Terms and Conditions**

- (a) Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of compliant coatings, usage limitations and compliance with the Air Toxics Policy.  
The permittee shall not employ coatings in emissions unit K002 with a VOC content greater than 3.5 pounds per gallon, excluding water and exempt solvents, as applied.  
The permittee shall not employ cleanup materials in emissions unit K001 with a VOC content greater than 7.35 pounds of VOC per gallon, as applied.  
The daily emission limitation outlined is based upon the emission unit's Potential to Emit (PTE). Therefore, no daily records are required to demonstrate compliance with these limits.

**B. Operational Restrictions**

1. The maximum coating usage for emissions unit K002 shall not exceed 800 gallons per year excluding water and exempt solvents.
2. The maximum cleanup material usage for emissions unit K002 shall not exceed 260 gallons per year.

**C. Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information for each month for emissions unit K002:
  - a. The name and identification number of each coating and cleanup material employed.
  - b. The number of gallons, of each coating employed per month, excluding water and exempt solvents.
  - c. The number of gallons, of each cleanup material employed per month.
  - d. The VOC content of each coating, in pounds per gallon, excluding water and exempt solvents, as applied.
  - e. The VOC content of each cleanup material, in pounds per gallon.
  - f. The total VOC emissions for all coating and cleanup materials, in tons per month. The sum of  $\{[(b)*(d)] + [(c)*(e)]\}/2000$ .
2. The permit to install for this emissions unit K002 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: Cyclohexanone

TLV (ug/m3): 100,000

Maximum Hourly Emission Rate (lbs/hr): 0.88

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1509

MAGLC (ug/m3): 2381

Physical changes to or 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 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 with the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], 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 its 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.
- D. Reporting Requirements**
1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing any of the following exceedances for emissions unit K002:
    - a. An exceedance of the annual coating and/or cleanup material usage or emission limitation.
    - b. An exceedance of the coating or cleanup material VOC content 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.
- E. Testing Requirements**
1. USEPA Methods 24 and 24A shall be used to determine the VOC content for coatings and cleanup materials employed in emissions unit K002. If, pursuant to section 4.3 of Method 24, 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.
  2. Compliance with annual VOC emission limit and the annual coating and cleanup material usage limit shall be determined by the recordkeeping requirements in section C.1. of this permit.
- F. Miscellaneous Requirements**
1. None