

Facility ID: 1413030394 Issuance type: Final State Permit To Operate

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

Facility ID: 1413030394 Emissions Unit ID: R001 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>
metal and non-metal parts paint spray booth no. 1	OAC rule 3745-31-05 PTI 14-4561	185 lbs/day and 2.65 TPY of organic compounds (OC) from the coatings used for metal parts 13.1 lbs/day and 0.98 TPY of OC from cleanup material usage 7.26 TPY of OC from the coatings used for non-metal parts 11 TPY of OC from coatings used for metal parts, from the coatings used for non-metal parts, and from the cleanup material usage 0.54 pound of particulate emissions (PE)/hr and 2.4 TPY of PE 6.55 lbs of OC/gallon of cleanup material
	OAC rule 3745-21-07(G)	See A.2.a. on any day when coating non-metal parts: 8 lbs/hr and 40 lbs/day of OC for the coatings used for non-metal parts
	OAC rule 3745-21-09(U)(1)(c)	on any day when coating metal parts: 3.5 lbs of volatile organic compounds (VOC)/gallon of coating, excluding water and exempt solvents, as applied, for the coatings used for metal parts
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from this emissions unit shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
	OAC rule 3745-17-11(B)(1)	The emission limitation established by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05 (BAT).

2. Additional Terms and Conditions

- (a) The actual emissions of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from emissions units R001 and R002 combined shall be less than 10 TPY as a rolling, twelve-month summation for any single HAP and 25 TPY as a rolling, twelve-month summation for the combination of all HAPs.

The daily emission limitation for metal parts coating (185 lbs of OC/day) and the annual PE limitation (2.4 TPY of PE) outlined in this permit are based upon the emissions unit's potential to emit. Therefore, no daily or annual records are required to demonstrate compliance with these limits.

B. Operational Restrictions

1. The maximum daily coating usage of coatings used for metal parts shall not exceed 52.8 gallons per day for this emissions unit.
2. The maximum daily coating usage of coatings used for non-metal parts shall not exceed 11 gallons per day for this emissions unit.
3. The maximum daily cleanup material usage for this emissions unit shall not exceed 2 gallons per day.
4. The maximum annual coating and cleanup material usage for this emissions unit shall not exceed 5,667 gallons of coating per year and 300 gallons of cleanup material per year.
5. The permittee shall not employ any cleanup material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for emissions units R001 and R002 combined:
 - a. The company name and identification number of each coating and cleanup material employed.
 - b. The organic HAP content for each individual HAP of each coating and cleanup material employed, in lbs/gallon.
 - c. The number of gallons of each coating employed.
 - d. The number of gallons of each cleanup material employed.
 - e. The total emissions of each individual HAP, in pounds, for all coatings employed [summation of (c x b) for each individual HAP for all the coatings].
 - f. The total emissions of each individual HAP, in pounds, for all cleanup materials employed [summation of (d x b) for each individual HAP for all the cleanup materials].
 - g. The total emissions of each individual HAP, in pounds, for all coatings and cleanup materials employed (e + f).
 - h. The rolling, 12-month summation of the monthly emissions of each individual HAP, in tons [the rolling, 12-month summation of individual HAP emissions shall be calculated by adding the individual HAP emissions (from section g) for the preceding 11 calendar months plus the individual HAP emissions for the current calendar month].
 - i. The total HAP emissions, in pounds, for all the coatings and cleanup materials employed [summation of g for all the HAPs].
 - j. The rolling, 12-month summation of the total monthly HAP emissions, in tons [the rolling, 12-month summation of the total HAP emissions shall be calculated by adding the total HAP emissions (from section i) for the preceding 11 calendar months plus the total HAP emissions for the current calendar month].

A listing of 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 line-by-line basis.
2. On any day when coating non-metal parts, the permittee shall collect and record the following information each day for this emissions unit for the coating of non-metal parts:
 - a. The company identification for each coating employed.
 - b. The number of gallons of each coating employed.
 - c. The total number of gallons of coating employed.
 - d. The OC content of each coating employed, in pounds per gallon, as applied.
 - e. The total OC emissions for all coatings employed [summation of (b x c) for all coatings], in pounds.
 - f. The total hours of operation.
 - g. The total average hourly OC emissions (e / f).
3. On any day when coating metal parts, the permittee shall collect and record the following information each day for this emissions unit for the coatings used for metal parts:
 - a. The company identification for each coating employed.
 - b. The number of gallons of each coating employed.
 - c. The total number of gallons of coating employed.
 - d. The VOC content of each coating employed, in pounds per gallon, and in pounds per gallon excluding water and exempt solvents.

4. The permittee shall maintain the following daily records for all cleanup materials employed in this emissions unit:
 - a. The company identification for each cleanup material employed.
 - b. Documentation on whether or not each cleanup material is a photochemically reactive material.
 - c. The number of gallons of each cleanup material employed.
 - d. The total number of gallons of cleanup material employed.
 - e. The OC content of each cleanup material employed, in pounds per gallon, as applied.
 - f. The total OC emissions for all cleanup materials employed [summation of (c x e) for all coatings], in pounds.
 5. The permittee shall collect and record the following information each month for this emissions unit for the coatings used for metal parts:
 - a. The company identification for each coating employed.
 - b. The number of gallons of each coating employed.
 - c. The OC content of each coating employed, in pounds per gallon, as applied.
 - d. The total OC emissions for all coatings employed [summation of (b x c) for all coatings], in pounds.
 6. The permittee shall collect and record the following information each month for this emissions unit for the coatings used for non-metal parts:
 - a. The company identification for each coating employed.
 - b. The number of gallons of each coating employed.
 - c. The OC content of each coating employed, in pounds per gallon, as applied.
 - d. The total OC emissions for all coatings employed [summation of (b x c) for all coatings], in pounds.
 7. The permittee shall collect and record the following information each month for this emissions unit for the cleanup materials:
 - a. The company identification for each cleanup material employed.
 - b. The number of gallons of each cleanup material employed.
 - c. The OC content of each cleanup material employed, in pounds per gallon, as applied.
 - d. The total OC emissions for all cleanup materials employed [summation of (b x c) for all coatings], in pounds.
- D. **Reporting Requirements**
1. The permittee shall submit quarterly deviation (excursion) reports which include the following information for this emissions unit:
 - a. An identification of each day during which a non-metal part was coated and the average hourly OC emissions from the coatings exceeded 8 pounds per hour and the actual average hourly OC emissions for each such day.
 - b. An identification of each day during which a non-metal part was coated and the OC emissions from the coatings exceeded 40 pounds per day, and the actual OC emissions for each such day.
 - c. An identification of each day during which the OC emissions from the cleanup material exceeded 13.1 pounds per day, and the actual OC emissions for each such day.
 - d. An identification of each day during which the daily coating usage for coating non-metal parts exceeded 11 gallons per day and the actual number of gallons used on each such day.
 - e. An identification of each day during which the daily cleanup material usage exceeded 2 gallons per day and the actual number of gallons used on each such day.
 2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing the use of noncomplying coatings and/or cleanup materials (i.e., for VOC and OC contents) in this emissions unit. 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 date of noncompliance.
 3. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services which summarize the following for this emissions unit:
 - a. The total OC emissions from coatings used for metal parts for this emissions unit for the previous calendar year.
 - b. The total OC emissions from coatings used for non-metal parts from this emissions unit for the previous calendar year.
 - c. The total OC emissions from cleanup materials for this emissions unit for the previous calendar year.
 - d. The total number of gallons of coatings employed in this emissions unit for the previous calendar year.
 - e. The total number of gallons of cleanup materials employed in this emissions unit for the previous calendar year.

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

4. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any cleanup material that was photochemically reactive was employed in this emissions unit. This report shall be submitted within 30 days following the date of noncompliance, and shall identify the cause for the use of the photochemically reactive cleanup material(s) and the estimated total quantity of material(s) emitted each such day.
5. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP emissions limitations set forth in this permit to operate. The permittee shall submit annual reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year. If no exceedances occurred during the reporting period, then a report is required stating so.

E. Testing Requirements

1. Compliance with the emission limitations specified in sections A.1 and A.2.a and the usage restrictions specified in section B of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitation -

185 lbs of OC/day (from the coatings used for metal parts)

Applicable Compliance Method -

Compliance with the above daily OC emission limitation shall be shown as long as compliance with the VOC content limitation and the usage restriction for coatings used for metal parts is maintained (the daily OC emission limitation for the coatings used for metal parts was calculated by multiplying the VOC content limitation by the daily usage restriction for coatings used for metal parts).

Emission Limitation -

2.65 TPY of OC (from the coatings used for metal parts)

Applicable Compliance Method -

Compliance with the above annual emission limitation shall be determined by the record keeping specified in section C.5 of the terms and conditions of this permit and shall be the sum of the monthly OC emissions for the calendar year.

Emission Limitation -

13.1 lbs/day of OC (from cleanup materials)

Applicable Compliance Method -

Compliance with the above daily emission limitation shall be determined by the record keeping specified in section C.4 of the terms and conditions of this permit.

Emission Limitation -

0.98 TPY of OC (from cleanup materials)

Applicable Compliance Method -

Compliance with the above annual emission limitation shall be determined by the record keeping in section C.7 of the terms and conditions of this permit and shall be the sum of the monthly OC emissions for the calendar year.

Emission Limitation -

11 TPY of OC (from the coatings used for metal parts, coatings used for non-metal parts, and cleanup materials)

Applicable Compliance Method -

Compliance with the above annual emission limitation shall be determined by the record keeping in sections C.5, C.6, and C.7 of these terms and conditions and shall be the sum of the monthly OC emissions for cleanup materials and coatings used for non-metal and metal parts for the calendar year.

Emission Limitation -

0.54 lb of PE/hr

Applicable Compliance Method -

To determine the actual worst case particulate emissions rate, the following equation shall be used:

$E = \text{maximum coating solids usage rate, in pounds per hour,} \times (1-TE) \times (1-CE)$

where E = particulate emissions rate (lbs/hr);

TE = fractional transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (0.55); and

CE = fractional control efficiency of the control equipment (0.90).

If required, the permittee shall demonstrate compliance with the above emissions limitation pursuant to OAC rule 3745-17-03(B)(10).

Emission Limitation -

2.4 TPY of PE

Applicable Compliance Method -

Compliance with the annual PE limitation is shown as long as compliance with the hourly PE limitation is maintained (the annual PE limitation was calculated by multiplying the hourly PE limitation by 8,760 and dividing by 2,000).

Emission Limitation -

6.55 lbs of OC/gallon of cleanup material

Applicable Compliance Method -

Compliance with the above emission limitation shall be determined by the record keeping in section C.4 of the terms and conditions of this permit.

Emission Limitation -

8 lbs of OC/hr (for the coatings used for non-metal parts)

Applicable Compliance Method -
Compliance with the above hourly OC emission limitation shall be determined by the record keeping in section C.2 of the terms and conditions of this permit.
Emission Limitation -
40 lbs of OC/day (for the coatings used for non-metal parts)

Applicable Compliance Method -
Compliance with the above daily emission limitation shall be determined by the record keeping specified in section C.2 of the terms and conditions of this permit.
Emission Limitation -
7.26 TPY of OC (from the coatings used for non-metal parts)

Applicable Compliance Method -
Compliance with the above annual OC limitation shall be determined by the record keeping in section C.6 of the terms and conditions of this permit and shall be the sum of the monthly OC emissions from coatings used for non-metal parts for the calendar year.
Emission Limitation -
3.5 lbs of VOC/gallon of coating used for metal parts, excluding water and exempt solvents, as applied

Applicable Compliance Method -
Compliance with the above emission limitation shall be determined by the record keeping in section C.3 of the terms and conditions of this permit.
Emission Limitation -
Visible emissions shall not exceed 20 % opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method -
Compliance with the above visible emission limitation shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in USEPA Reference Method 9.
Usage Restriction -
52.8 gallons/day (for the coatings used for metal parts)

Applicable Compliance Method -
Compliance with the above daily coating usage restriction shall be determined by the record keeping in section C.3 of the terms and conditions of this permit.
Usage Restriction -
11 gallons/day (for the coatings used for non-metal parts)

Applicable Compliance Method -
Compliance with the above daily coating usage restriction shall be determined by the record keeping in section C.2 of the terms and conditions of this permit.
Usage Restriction -
2 gallons/day (for cleanup materials)

Applicable Compliance Method -
Compliance with the above daily cleanup material usage restriction shall be determined by the record keeping in section C.4 of the terms and conditions of this permit.
Usage Restriction -
5,667 gallons/year (for the coatings used for metal and non-metal parts combined)

Applicable Compliance Method -
Compliance with the above annual coating usage restriction shall be determined by the record keeping in sections C.2 and C.3 of the terms and conditions of this permit and shall be the sum of the daily usages of coatings used for metal and non-metal parts for the calendar year.
Emission Limitation -
25 tons/rolling, 12-month period (for all HAPs combined)
10 tons/rolling, 12-month period (for any individual HAP)

Applicable Compliance Method -
Compliance with the HAP limitations shall be determined by the record keeping requirements in section C.1 of the terms and conditions of this permit.

2. USEPA Method 24 or 24A shall be used to determine the VOC content for all coatings and cleanup materials employed in this emissions unit. 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 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.

F. Miscellaneous Requirements

1. This permit allows the use of the coatings and cleanup materials specified by the permittee in the application for PTI number 14-4561. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the VOC emission limitation(s) specified in this permit was (were) established in accordance with the Ohio EPA's "Air Toxics Policy" and is (are) based on both the coating and cleanup material formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the Screen 3 model and a comparison of the predicted 1 hour maximum ground-level concentration to the MAGLC.

The following summarizes the results of the modeling for each pollutant:

Pollutant: Isobutanol

TLV (ug/m3): 152,000

Maximum Hourly Emission Rate (lbs/hr): 3.6 each

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 3,022.97 (R001 and R002)

combined)

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 3,619

Pollutant: Xylene

TLV (ug/m3): 434,000

Maximum Hourly Emission Rate (lbs/hr): 4.9 each

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 4,113 (R001 and R002 combined)

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 10,333

Any of the following changes may be deemed a "modification" to the emissions unit and, as such, prior notification to and approval from the appropriate Ohio EPA District Office or local air agency are required, including the possible issuance of modifications to PTI number 14-4561 and the operating permit:

- a. Any changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup 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 specified in the above table.
 - b. Any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of any MAGLC specified in the above table.
 - c. Any change to the emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01.
 - d. Any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in the emission of any of the exempted organic compounds included in the definition of "VOC" [OAC rule 3745-21-01(B)(6)].
 - e. Any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in an increase in emissions of any HAPS as defined in OAC rule 3745-77-01(V).
2. The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:
- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
 - b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
 - c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.
- For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.
3. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
- a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and
 - b. 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 is hereby notified that this permit and all agency records concerning the operation of this permitted emissions unit are subject to public disclosure in accordance with OAC rule 3745-49-03.

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

Facility ID: 1413030394 Emissions Unit ID: R002 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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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>
metal and non-metal parts paint spray booth no. 2	OAC rule 3745-31-05 PTI 14-4561	185 lbs/day and 2.65 TPY of organic compounds (OC) from the coatings used for metal parts 13.1 lbs/day and 0.98 TPY of OC from cleanup material usage 7.26 TPY of OC from the coatings used for non-metal parts 11 TPY of OC from coatings used for metal parts, from the coatings used for non-metal parts, and from the cleanup material usage 0.54 pound of particulate emissions (PE)/hr and 2.4 TPY of PE 6.55 lbs of OC/gallon of cleanup material See A.2.a. on any day when coating non-metal parts: 8 lbs/hr and 40 lbs/day of OC for the coatings used for non-metal parts on any day when coating metal parts: 3.5 lbs of volatile organic compounds (VOC)/gallon of coating, excluding water and exempt solvents, as applied, for the coatings used for metal parts Visible particulate emissions from this emissions unit shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule. The emission limitation established by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05 (BAT).
	OAC rule 3745-21-07(G)	
	OAC rule 3745-21-09(U)(1)(c)	
	OAC rule 3745-17-07(A)(1)	
	OAC rule 3745-17-11(B)(1)	

2. Additional Terms and Conditions

- (a) The actual emissions of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from emissions units R001 and R002 combined shall be less than 10 TPY as a rolling, twelve-month summation for any single HAP and 25 TPY as a rolling, twelve-month summation for the combination of all HAPs.
The daily emission limitation for metal parts coating (185 lbs of OC/day) and the annual PE limitation (2.4 TPY of PE) outlined in this permit are based upon the emissions unit's potential to emit. Therefore, no daily or annual records are required to demonstrate compliance with these limits.

B. Operational Restrictions

1. The maximum daily coating usage of coatings used for metal parts shall not exceed 52.8 gallons per day for this emissions unit.
2. The maximum daily coating usage of coatings used for non-metal parts shall not exceed 11 gallons per day for this emissions unit.
3. The maximum daily cleanup material usage for this emissions unit shall not exceed 2 gallons per day.
4. The maximum annual coating and cleanup material usage for this emissions unit shall not exceed 5,667 gallons of coating per year and 300 gallons of cleanup material per year.
5. The permittee shall not employ any cleanup material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for emissions units R001 and R002 combined:
 - a. The company name and identification number of each coating and cleanup material employed.
 - b. The organic HAP content for each individual HAP of each coating and cleanup material employed, in lbs/gallon.
 - c. The number of gallons of each coating employed.

- d. The number of gallons of each cleanup material employed.
 - e. The total emissions of each individual HAP, in pounds, for all coatings employed [summation of (c x b) for each individual HAP for all the coatings].
 - f. The total emissions of each individual HAP, in pounds, for all cleanup materials employed [summation of (d x b) for each individual HAP for all the cleanup materials].
 - g. The total emissions of each individual HAP, in pounds, for all coatings and cleanup materials employed (e + f).
 - h. The rolling, 12-month summation of the monthly emissions of each individual HAP, in tons [the rolling, 12-month summation of individual HAP emissions shall be calculated by adding the individual HAP emissions (from section g) for the preceding 11 calendar months plus the individual HAP emissions for the current calendar month].
 - i. The total HAP emissions, in pounds, for all the coatings and cleanup materials employed [summation of g for all the HAPs].
 - j. The rolling, 12-month summation of the total monthly HAP emissions, in tons [the rolling, 12-month summation of the total HAP emissions shall be calculated by adding the total HAP emissions (from section i) for the preceding 11 calendar months plus the total HAP emissions for the current calendar month].
- A listing of 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 line-by-line basis.
2. On any day when coating non-metal parts, the permittee shall collect and record the following information each day for this emissions unit for the coating of non-metal parts:
 - a. The company identification for each coating employed.
 - b. The number of gallons of each coating employed.
 - c. The total number of gallons of coating employed.
 - d. The OC content of each coating employed, in pounds per gallon, as applied.
 - e. The total OC emissions for all coatings employed [summation of (b x c) for all coatings], in pounds.
 - f. The total hours of operation.
 - g. The total average hourly OC emissions (e / f).
 3. On any day when coating metal parts, the permittee shall collect and record the following information each day for this emissions unit for the coatings used for metal parts:
 - a. The company identification for each coating employed.
 - b. The number of gallons of each coating employed.
 - c. The total number of gallons of coating employed.
 - d. The VOC content of each coating employed, in pounds per gallon, and in pounds per gallon excluding water and exempt solvents.
 4. The permittee shall maintain the following daily records for all cleanup materials employed in this emissions unit:
 - a. The company identification for each cleanup material employed.
 - b. Documentation on whether or not each cleanup material is a photochemically reactive material.
 - c. The number of gallons of each cleanup material employed.
 - d. The total number of gallons of cleanup material employed.
 - e. The OC content of each cleanup material employed, in pounds per gallon, as applied.
 - f. The total OC emissions for all cleanup materials employed [summation of (c x e) for all coatings], in pounds.
 5. The permittee shall collect and record the following information each month for this emissions unit for the coatings used for metal parts:
 - a. The company identification for each coating employed.
 - b. The number of gallons of each coating employed.
 - c. The OC content of each coating employed, in pounds per gallon, as applied.
 - d. The total OC emissions for all coatings employed [summation of (b x c) for all coatings], in pounds.
 6. The permittee shall collect and record the following information each month for this emissions unit for the coatings used for non-metal parts:
 - a. The company identification for each coating employed.

- b. The number of gallons of each coating employed.
 - c. The OC content of each coating employed, in pounds per gallon, as applied.
 - d. The total OC emissions for all coatings employed [summation of (b x c) for all coatings], in pounds.
7. The permittee shall collect and record the following information each month for this emissions unit for the cleanup materials:
- a. The company identification for each cleanup material employed.
 - b. The number of gallons of each cleanup material employed.
 - c. The OC content of each cleanup material employed, in pounds per gallon, as applied.
 - d. The total OC emissions for all cleanup materials employed [summation of (b x c) for all coatings], in pounds.
- D. Reporting Requirements**
1. The permittee shall submit quarterly deviation (excursion) reports which include the following information for this emissions unit:
- a. An identification of each day during which a non-metal part was coated and the average hourly OC emissions from the coatings exceeded 8 pounds per hour and the actual average hourly OC emissions for each such day.
 - b. An identification of each day during which a non-metal part was coated and the OC emissions from the coatings exceeded 40 pounds per day, and the actual OC emissions for each such day.
 - c. An identification of each day during which the OC emissions from the cleanup material exceeded 13.1 pounds per day, and the actual OC emissions for each such day.
 - d. An identification of each day during which the daily coating usage for coating non-metal parts exceeded 11 gallons per day and the actual number of gallons used on each such day.
 - e. An identification of each day during which the daily cleanup material usage exceeded 2 gallons per day and the actual number of gallons used on each such day.
2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing the use of noncomplying coatings and/or cleanup materials (i.e., for VOC and OC contents) in this emissions unit. 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 date of noncompliance.
3. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services which summarize the following for this emissions unit:
- a. The total OC emissions from coatings used for metal parts for this emissions unit for the previous calendar year.
 - b. The total OC emissions from coatings used for non-metal parts from this emissions unit for the previous calendar year.
 - c. The total OC emissions from cleanup materials for this emissions unit for the previous calendar year.
 - d. The total number of gallons of coatings employed in this emissions unit for the previous calendar year.
 - e. The total number of gallons of cleanup materials employed in this emissions unit for the previous calendar year.
- These reports shall be submitted by January 31 of each year.
4. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any cleanup material that was photochemically reactive was employed in this emissions unit. This report shall be submitted within 30 days following the date of noncompliance, and shall identify the cause for the use of the photochemically reactive cleanup material(s) and the estimated total quantity of material(s) emitted each such day.
5. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP emissions limitations set forth in this permit to operate. The permittee shall submit annual reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year. If no exceedances occurred during the reporting period, then a report is required stating so.
- E. Testing Requirements**
1. Compliance with the emission limitations specified in sections A.1 and A.2.a and the usage restrictions specified in section B of these terms and conditions shall be determined in accordance with the following methods:
- Emission Limitation -
185 lbs of OC/day (from the coatings used for metal parts)
- Applicable Compliance Method -
Compliance with the above daily OC emission limitation shall be shown as long as compliance with the VOC content limitation and the usage restriction for coatings used for metal parts is maintained (the daily OC emission limitation for the coatings used for metal parts was calculated by multiplying the VOC content limitation by the daily usage restriction for coatings used for metal parts).
- Emission Limitation -
2.65 TPY of OC (from the coatings used for metal parts)

Applicable Compliance Method -

Compliance with the above annual emission limitation shall be determined by the record keeping specified in section C.5 of the terms and conditions of this permit and shall be the sum of the monthly OC emissions for the calendar year.

Emission Limitation -
13.1 lbs/day of OC (from cleanup materials)

Applicable Compliance Method -

Compliance with the above daily emission limitation shall be determined by the record keeping specified in section C.4 of the terms and conditions of this permit.

Emission Limitation -
0.98 TPY of OC (from cleanup materials)

Applicable Compliance Method -

Compliance with the above annual emission limitation shall be determined by the record keeping in section C.7 of the terms and conditions of this permit and shall be the sum of the monthly OC emissions for the calendar year.

Emission Limitation -
11 TPY of OC (from the coatings used for metal parts, coatings used for non-metal parts, and cleanup materials)

Applicable Compliance Method -

Compliance with the above annual emission limitation shall be determined by the record keeping in sections C.5, C.6, and C.7 of these terms and conditions and shall be the sum of the monthly OC emissions for cleanup materials and coatings used for non-metal and metal parts for the calendar year.

Emission Limitation -
0.54 lb of PE/hr

Applicable Compliance Method -

To determine the actual worst case particulate emissions rate, the following equation shall be used:

$E = \text{maximum coating solids usage rate, in pounds per hour,} \times (1-TE) \times (1-CE)$

where E = particulate emissions rate (lbs/hr);

TE = fractional transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (0.55); and

CE = fractional control efficiency of the control equipment (0.90).

If required, the permittee shall demonstrate compliance with the above emissions limitation pursuant to OAC rule 3745-17-03(B)(10).

Emission Limitation -
2.4 TPY of PE

Applicable Compliance Method -

Compliance with the annual PE limitation is shown as long as compliance with the hourly PE limitation is maintained (the annual PE limitation was calculated by multiplying the hourly PE limitation by 8,760 and dividing by 2,000).

Emission Limitation -
6.55 lbs of OC/gallon of cleanup material

Applicable Compliance Method -

Compliance with the above emission limitation shall be determined by the record keeping in section C.4 of the terms and conditions of this permit.

Emission Limitation -
8 lbs of OC/hr (for the coatings used for non-metal parts)

Applicable Compliance Method -

Compliance with the above hourly OC emission limitation shall be determined by the record keeping in section C.2 of the terms and conditions of this permit.

Emission Limitation -
40 lbs of OC/day (for the coatings used for non-metal parts)

Applicable Compliance Method -

Compliance with the above daily emission limitation shall be determined by the record keeping specified in section C.2 of the terms and conditions of this permit.

Emission Limitation -
7.26 TPY of OC (from the coatings used for non-metal parts)

Applicable Compliance Method -

Compliance with the above annual OC limitation shall be determined by the record keeping in section C.6 of the terms and conditions of this permit and shall be the sum of the monthly OC emissions from coatings used for non-metal parts for the calendar year.

Emission Limitation -
3.5 lbs of VOC/gallon of coating used for metal parts, excluding water and exempt solvents, as applied

Applicable Compliance Method -

Compliance with the above emission limitation shall be determined by the record keeping in section C.3 of the terms and conditions of this permit.

Emission Limitation -
Visible emissions shall not exceed 20 % opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method -

Compliance with the above visible emission limitation shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in

USEPA Reference Method 9.

Usage Restriction -
52.8 gallons/day (for the coatings used for metal parts)

Applicable Compliance Method -
Compliance with the above daily coating usage restriction shall be determined by the record keeping in section C.3 of the terms and conditions of this permit.

Usage Restriction -
11 gallons/day (for the coatings used for non-metal parts)

Applicable Compliance Method -
Compliance with the above daily coating usage restriction shall be determined by the record keeping in section C.2 of the terms and conditions of this permit.

Usage Restriction -
2 gallons/day (for cleanup materials)

Applicable Compliance Method -
Compliance with the above daily cleanup material usage restriction shall be determined by the record keeping in section C.4 of the terms and conditions of this permit.

Usage Restriction -
5,667 gallons/year (for the coatings used for metal and non-metal parts combined)

Applicable Compliance Method -
Compliance with the above annual coating usage restriction shall be determined by the record keeping in sections C.2 and C.3 of the terms and conditions of this permit and shall be the sum of the daily usages of coatings used for metal and non-metal parts for the calendar year.

Emission Limitation -
25 tons/rolling, 12-month period (for all HAPs combined)
10 tons/rolling, 12-month period (for any individual HAP)

Applicable Compliance Method -
Compliance with the HAP limitations shall be determined by the record keeping requirements in section C.1 of the terms and conditions of this permit.

2. USEPA Method 24 or 24A shall be used to determine the VOC content for all coatings and cleanup materials employed in this emissions unit. 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 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.

F. **Miscellaneous Requirements**

1. This permit allows the use of the coatings and cleanup materials specified by the permittee in the application for PTI number 14-4561. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the VOC emission limitation(s) specified in this permit was (were) established in accordance with the Ohio EPA's "Air Toxics Policy" and is (are) based on both the coating and cleanup material formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the Screen 3 model and a comparison of the predicted 1 hour maximum ground-level concentration to the MAGLC.

The following summarizes the results of the modeling for each pollutant:

Pollutant: Isobutanol

TLV (ug/m3): 152,000
Maximum Hourly Emission Rate (lbs/hr): 3.6 each
Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 3,022.97 (R001 and R002 combined)
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 3,619

Pollutant: Xylene

TLV (ug/m3): 434,000
Maximum Hourly Emission Rate (lbs/hr): 4.9 each
Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 4,113 (R001 and R002 combined)
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 10,333

Any of the following changes may be deemed a "modification" to the emissions unit and, as such, prior notification to and approval from the appropriate Ohio EPA District Office or local air agency are required, including the possible issuance of modifications to PTI number 14-4561 and the operating permit:

- a. Any changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup 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 specified in the above table.
- b. Any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of any MAGLC specified in the above table.
- c. Any change to the emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01.
- d. Any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in the emission of any of the exempted organic compounds included in the definition

of "VOC" [OAC rule 3745-21-01(B)(6)].

- e. Any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in an increase in emissions of any HAPS as defined in OAC rule 3745-77-01(V).
2. The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:
 - a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
 - b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
 - c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.
 3. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
 - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and
 - b. 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 is hereby notified that this permit and all agency records concerning the operation of this permitted emissions unit are subject to public disclosure in accordance with OAC rule 3745-49-03.