

Facility ID: 1413080442 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: 1413080442 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>
miscellaneous metal parts paint booth	OAC rule 3745-31-05(A)(3) (PTI 14-04611)	57.2 lbs of volatile organic compound (VOC) emissions/day from both coatings and cleanup materials 10.44 tons per year (TPY) of VOC emissions from both coatings and cleanup materials The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(2) (f) and 3745-31-05(D). See Sections A.2.c, A.2.d, B.1 and B.2 below.
	OAC rule 3745-31-05(D)	See Section A.2.a below.
	OAC rule 3745-21-09(U)(2)(f)	See Section A.2.b below.

2. Additional Terms and Conditions

- (a) The total allowable usage of hazardous air pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY* for any single HAP and 24.9 TPY* for any combination of HAPs. Compliance with the above emission limitations shall be based on a rolling, 12-month summation.

* This assumes the HAPs emitted are the same as the amounts of HAPs used since all HAPs used evaporated.
Pursuant to OAC rule 3745-21-09(U)(2)(f), the Director has determined that "best available technology" for this emissions unit, as defined in PTI #14-04611, is a control requirement or emission limitation that is either less stringent than or inconsistent with the requirements of paragraph (U)(1) of OAC rule 3745-21-09. Specifically, the VOC content limitation in the PTI for coatings is less stringent than the applicable VOC content limitation in paragraph (U)(1) of OAC rule 3745-21-09.
The permittee shall not employ coatings with a VOC content greater than 5.6 pounds per gallon, as applied, including water and exempt solvents.
The permittee shall not employ cleanup materials with a VOC content greater than 6.2 pounds of VOC per gallon.

B. Operational Restrictions

1. The maximum coating usage shall not exceed 8 gallons per day and 2,920 gallons per year, including water and exempt solvents.
2. The maximum cleanup material usage shall not exceed 2 gallons per day and 730 gallons per year.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the name and identification number of each coating employed;
 - b. the volume, in gallons, of each coating employed, including water and exempt solvents;

- c. the VOC content of each coating, in pounds per gallon, as applied, including water and exempt solvents;
- d. the name and identification of each cleanup material employed;
- e. the volume, in gallons, of each cleanup material employed;
- f. the VOC content of each cleanup material, in pounds per gallon; and
- g. the total VOC emission rate for all coatings and cleanup materials employed, in pounds per day [summation of (b x c) for all coatings employed during the day, plus the summation of (e x f) for all cleanup materials employed during the day].
2. The permittee shall collect and record the following information each month for the entire facility:
- a. the name and identification number of each coating employed;
- b. the individual HAP content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;
- c. the total combined HAP 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 usage 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 (and divided by 2,000 lbs/ton if the units are in tons)];
- j. the total combined HAP usage 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 (and divided by 2,000 lbs/ton if the units are in tons)];
- k. the updated rolling, 12-month summation of usage for each individual HAP emitted**, in tons (this shall include the information for the current month and the preceding eleven calendar months); and
- l. the updated rolling, 12-month summation of usage for total combined HAPs emitted**, in tons. This shall include the information for the current month and the preceding eleven calendar months.
- * 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.
- ** This assumes the HAPs emitted are the same as the amounts of HAPs used since all HAPs used evaporated.
3. The permit to install for this emissions unit was evaluated based on the actual materials employed (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. Ohio EPA's "Review of New Sources of Air Toxics Emissions" policy ("Air Toxics Policy") was applied for each toxic 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 Acceptable Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutants:

Pollutant: 2-butoxyethanol
 TLV (ug/m3): 121,000
 Maximum Hourly Emission Rate (lbs/hr): 5.6
 Predicted 1-Hour Maximum Ground-Level
 Concentration (ug/m3): 1,517
 MAGLC (ug/m3): 2,881

Pollutant: Toluene
 TLV (ug/m3): 188,000
 Maximum Hourly Emission Rate (lbs/hr): 5.6
 Predicted 1-Hour Maximum Ground-Level
 Concentration (ug/m3): 1,517
 MAGLC (ug/m3): 4,476

Pollutant: Xylene
 TLV (ug/m3): 434,000
 Maximum Hourly Emission Rate (lbs/hr): 3.27
 Predicted 1-Hour Maximum Ground-Level
 Concentration (ug/m3): 834
 MAGLC (ug/m3): 10,333
 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 Toxics Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxics Policy" will not be satisfied, the permittee shall not make the change. Changes that can affect the parameters used in the "Air Toxics Policy" include the following:

a. changes in the composition of the materials used, or the use of new materials that would result in the emission of a compound 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 Toxics Policy" will be satisfied with the above changes, 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 Toxics 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 Toxics 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 Toxics Policy" for the change.

D. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record identifying any of the following:

a. an exceedance of the VOC content limitation(s) for any coating and/or cleanup material employed;

b. an exceedance of the daily coating and/or cleanup material usage limitation(s); and

c. an exceedance of the daily VOC emission limitation;

The notification shall include a copy of such record and sent to the Hamilton County Department of Environmental Services within 30 days after the exceedance occurs.

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month HAP emission limitations of 9.9 tons and 24.9 tons for any single HAP and combination of HAPs, respectively.

All quarterly deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the VOC and HAP emission limitations, the VOC content limitations and the material usage restrictions specified in Sections A and B shall be determined by the following methods:
VOC Emission Limitations: 57.2 lbs/day of VOC emissions from both coatings and cleanup materials; 10.44 TPY of VOC emissions from both coatings and cleanup materials

Applicable Compliance Method: Compliance with the daily VOC emission limitation shall be determined by the record keeping requirements specified in Section C.1. Compliance with the annual VOC emission limitation is ensured if compliance is maintained with the VOC content limitations and the daily material usage restrictions for both coatings and cleanup materials.
HAP Emission Limitations: 9.9 TPY of HAP emissions for any single HAP; 24.9 TPY of HAP emissions for any combination of HAPs

Applicable Compliance Method: Compliance with the HAP emission limitations shall be determined by the record keeping requirements specified in Section C.2.
VOC Content Limitations: 5.6 lbs of VOC/gallon for coatings, including water and exempt solvents; 6.2 lbs of VOC/gallon for cleanup materials

Applicable Compliance Method: Compliance with the VOC content limitations shall be determined by the record keeping requirements specified in Section C.1. If, pursuant to Section 4.3 of Method 24, 40 CFR, Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the U.S. EPA and shall use formulation data for that coating to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A. Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of any cleanup material.

Material Usage Restrictions: 8 gallons/day and 2,920 gallons/year of coatings, including water and exempt solvents; 2 gallons/day and 730 gallons/year for cleanup materials

Applicable Compliance Method: Compliance with the daily material usage restrictions shall be determined by the record keeping requirements specified in Section C.1. Compliance with the annual material usage restrictions are ensured if compliance is maintained with the daily material usage restrictions.

F. Miscellaneous Requirements

1. None