Facility ID: 1431050909 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.

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

Facility ID: 1431050909 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K002 - Paint Line 4	OAC rule 3745-31-05(A)(3) (PTI 14-05592)	Organic Compound (OC) emissions shall not exceed 21.0 lbs/day, including emissions from cleanup materials. See terms and conditions A.2.a and A.2.d. See section B.1. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e)(ii) and OAC rule 3745-31-05(C).
	OAC rule 3745-31-05(C)	Organic compound (OC) emissions shall not exceed 2.63 tons per year (TPY) based upon a rolling, 12-month summation. See term and condition A.2.b. See section B.2.
	OAC rule 3745-21-07(G)(2)	See term A.2.d. The daily emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-09(U)(2)(e)(ii)	See section B.3.

2. **Additional Terms and Conditions**

   (a) The OC content, as applied, of each coating employed in this emissions unit shall not exceed 7.0 pounds of OC per gallon of coating.
   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 (Paint Line 2), K002 (Paint Line 4), K003 (Paint Line 5), K004 (Paint Line 6), K005 (Paint Line 7), K006 (Miscellaneous Metal Parts Paint Booth), K007 (Paint Line 3), K008 (Paint Line 8), P002 (Automatic Binks Paint Machine), P005 (Facility-wide Miscellaneous Solvent Use), all deminimus emissions units (as defined in OAC rule 3745-12-05), all emissions units exempt from the requirements to obtain a permit to install pursuant to OAC rule 374531-05, 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.
   Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the OC content limitation, the OC emission limitations and the OC input limitations.
   Organic compound (OC) emissions shall not exceed 8 lbs/hr when applying coatings identified as Photochemically Reactive Materials (PRM) to non-metal parts which are not oven-cured.

B. **Operational Restrictions**

1. The maximum daily OC input of coatings and cleanup materials employed in emissions unit K002 shall not exceed 21.0 pounds per day, as applied.

2. The maximum annual OC input of coatings and cleanup materials employed in emissions unit K002 shall not

exceed 5,250 pounds per year based upon a rolling, 12-month summation, as applied. The OC input shall be determined by multiplying the number of gallons of coating employed per month by the OC content of each coating, in pounds per gallon and the number of gallons of cleanup material employed per month by the OC content of each cleanup material, in pounds per gallon. The OC input rate of coatings and cleanup materials employed are based upon the premise that 100% of the solvent contained within the coatings and cleanup materials is emitted.

3. The maximum daily coating usage for this emissions unit shall not exceed 3 gallons per day when coating miscellaneous metal parts.

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

1. The permittee shall collect and record the following information each day for emissions unit K002:

a. the name and identification number of each coating;

b. the volume, in gallons, of each coating employed on miscellaneous metal parts, and the volume, in gallons, of each coating employed on non-metal parts;

c. the total volume, in gallons, of all of the coatings employed;

d. the OC content of each coating applied to miscellaneous metal parts, in pounds OC per gallon of coating, as applied;

e. the OC content of each coating applied to miscellaneous metal and non-metal parts, in pounds OC per gallon of coating, as applied;

f. the OC emissions from the application of coatings, in pounds OC per day [the summation of b. multiplied by e. for the coating(s) employed in K002]; and

g. a record of each coating employed in this emissions unit indicating, whether or not the coating is photochemically reactive as identified in OAC rule 3745-21-01(C)(5);
[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

h. the name and identification number of each cleanup material;

i. the total volume, in gallons, of all of the cleanup materials employed;

j. the OC content of each cleanup material employed, in pounds OC per gallon;

k. the OC emissions from the use of cleanup materials, in pounds OC per day [the summation of i. multiplied by j. for the cleanup material(s) employed in K002]; and

l. the total OC emissions (sum of f and k), in pounds OC per day.

2. The permittee shall maintain monthly records of the total OC input, in pounds, of all coatings and cleanup materials employed in this emissions unit and the updated rolling, 12-month summation of the total OC input and emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calender months.

3. The permittee shall collect and record the following information for each hour when applying coatings identified as Photochemically Reactive Materials (PRMs) on non-metal parts in emissions unit K002:

a. the company identification for each coating and cleanup material employed;

b. for each day during which a photochemically reactive material is employed, the volume, in gallons, of each coating and cleanup material, each hour of the day;

c. the OC content of each cleanup material and coating, in pounds OC per gallon of coating, as applied; and

d. for each hour during which a photochemically reactive material is employed, the total OC emission rate for all cleanup materials and coatings, in pounds per hour (b. multiplied by c. for the non-metal PRM coating(s) and cleanup material(s) employed in K002).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically" are based upon OAC rule 3745-21-01(C)(5)].

4. The permittee shall collect and record the following information each month for the emissions units outlined in term A.2.b:

a. the name and identification number of each coating, employed;

b. the individual Hazardous Air Pollutant (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 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, in pounds or tons. This shall include the information for the current month and the preceeding eleven calender months; and

l. the updated rolling, 12-month summation of emissions for total combined HAP, in pounds or tons. This shall include the information for the current month and the preceeding eleven calender 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.

5. The permit to install for this emissions unit (K002) was evaluated based on the actual 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: Diethylenetriamine

TLV (ug/m3): 4,200

Maximum Hourly Emission Rate (lbs/hr): 0.1664

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 92

MAGLC (ug/m3): 100

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, 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.

D. **Reporting Requirements**

1. The permittee shall submit quarterly deviation reports which identify any exceedance of the HAP emission limitations set forth in term and condition A.2.b.

The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous three calendar months (October through December, January through March, April through June and July through September, respectively.)

If no exceedances occurred, the permittee shall state so in the report.

2. The permittee shall notify the Hamilton County Department of Environmental Services of any daily record showing that emissions unit K002 employed coatings that exceeded the applicable maximum OC content limits outlined in term and condition A.2.a. A copy of such record shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance(s) occurred.

3. The permittee shall notify the Hamilton County Department of Environmental Services of any daily record showing that emissions unit K002 employed more than the applicable maximum daily OC input limit outlined in term and condition B.1. A copy of such record shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurred.

4. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage as outlined in term and condition B.3. (i.e., the maximum daily coating usage for this emissions unit shall not exceed 3 gallons per day when coating miscellaneous metal parts). The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.

5. The permittee shall notify the Hamilton County Department of Environmental Services of any daily record showing an identification of each hour during which the organic compound emissions from the non-metal parts coatings when applying photochemically reactive materials exceeded 8 pounds per hour, and the actual organic compound emissions for each such hour.

   A copy of such record shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance(s) occurred.

6. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services which specify the total OC emissions from emissions unit K006 for the previous calendar year. These reports shall be submitted by January 31 of each year.

7. The permittee shall submit quarterly deviation reports which identify any exceedance of the rolling, 12-month OC input section B.2. If no exceedances occurred, the permittee shall state so in the report.

   The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous three calendar months (October through December, January through March, April through June and July through September, respectively.)

E. **Testing Requirements**

1. Compliance with the emission limitations and other limitations in sections A and B of these terms and conditions shall be determined in accordance with the following methods:

   a. Emission Limitation:

   Organic compound (OC) emissions shall not exceed 8 lbs/hr when applying coatings identified as Photochemically Reactive Materials (PRM) to non-metal parts which are not oven-cured.

   Applicable Compliance Method:

   Compliance with the hourly OC emissions limitation shall be demonstrated by the record keeping requirement in section C.3.

   b. Emission Limitation:

   Organic Compound (OC) emission shall not exceed 21.0 lbs/day, including emissions from cleanup materials.

   Applicable Compliance Method:

   Compliance with the daily OC emissions limitation shall be demonstrated by the record keeping requirement in section C.1.

   c. Emission Limitation:

   Organic Compound (OC) emissions shall not exceed 2.63 tons per year (TPY) based upon a rolling, 12-month summation.

   Applicable Compliance Method:

   Compliance with the annual OC emissions limitation shall be demonstrated by the record keeping requirement in section C.2.

   d. OC Content Limitation:

   The OC content, as applied, of each coating employed in this emissions unit shall not exceed 7.0 pounds of OC per gallon of coating.

   Applicable Compliance Method:

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

   e. Material Usage Limitations:

   The maximum daily OC input of coatings and cleanup materials employed in emissions unit K001 shall not

exceed 21.0 pounds per day, as applied.

The maximum annual OC input of coatings and cleanup materials employed in emissions unit K001 shall not exceed 5,250 pounds per year based upon a rolling, 12-month summation, as applied.

Applicable Compliance Method:

Compliance with the OC input limitations in sections B.1 and 2 shall be demonstrated by the record keeping in sections C.1 and C.2.
f. Emission Limitation:

9.9 TPY for any single HAP and 24.9 TPY for combined HAPs from emission units identified in term and condition A.2.b.

Applicable Compliance Method:

Compliance with the HAP emission limitations will be determined by the record keeping requirements specified in section C.4.

2. Compliance with the coating usage limitation in section B.3 shall be determined by the record keeping requirements as specified 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.3, C.4, D and E.