Facility ID: 1431054014 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: 1431054014 Emissions Unit ID: R001 Issuance type: Final State Permit To Operate

Go to the top of this document

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
wood coating line #1	OAC rule 3745-31-05(A)(3) (PTI 14-4693)	3.5 tons per year (TPY) of organic compound (OC) emissions See A.2.
	OAC rule 3745-21-07(G)(2)	8 pounds/hour of OC emissions 40 pounds/day of OC emissions

2. **Additional Terms and Conditions**

   (a) The OC content of each coating and cleanup material employed in this emissions unit shall not exceed 7.0 pounds of OC per gallon.
   Compliance with OAC rule 3745-31-05(A)(3) shall be determined by compliance with the Air Toxic Policy and a coating and cleanup material usage restriction.
   The total 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, as a rolling, 12-month summation, and 24.9 TPY* for any combination of HAPs, as a rolling, 12-month summation.

   * This assumes the amount of HAPs used is equivalent to the amount of HAPs that will evaporate and be emitted.

B. **Operational Restrictions**

1. The maximum annual combined coating and cleanup material usage shall not exceed a total of 1000 gallons.

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

1. 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 number 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 [for each HAP, the sum of (b) times (d) for all coatings plus the sum of (f) times (h) for all cleanup

materials, and divided by 2,000 pounds per ton if the units are in tons];

j. the total combined HAP usage** from all coatings and cleanup materials employed, in pounds or tons [the sum of (c) times (d) for all coatings plus the sum of (g) times (h) for all cleanup materials, and divided by 2,000 pounds per ton if the units are in tons];
k. the updated rolling, 12-month summation of usage for each individual HAP**, 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 the total combined HAPs**, 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 line-by-line basis.

** This assumes the amount of HAPs used is equivalent to the amount of HAPs that will evaporate and be emitted.

2. The permittee shall collect and record the following information for each day for emissions unit R001:

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

b. the number of gallons of each coating and cleanup material employed;

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

d. the total OC emission rate for all coatings and cleanup materials, in pounds of OC emissions per day [summation of (b) x (c) for all coatings and cleanup materials];

e. the total number of hours the emissions unit was in operation; and

f. the average hourly OC emission rate for all coatings and cleanup materials, i.e., (d)/(e), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

3. The permittee shall collect and record the number of gallons of coatings and cleanup materials employed each calendar year for emissions unit R001.

4. The permittee shall collect and record the following information for each change where 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.

D. **Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that contain the following information:

a. an identification of each day during which the average hourly OC emissions from the coatings and cleanup materials exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day;

b. an identification of each day during which the OC emissions from the coatings and cleanup materials exceeded 40 pounds per day, and the actual OC emissions for each such day;

c. an identification of any exceedance of the rolling, 12-month HAP usage limitations set forth in Term and Condition (T&C) A.2.c; and

d. an identification of any exceedance of the coating and cleanup material OC content limitation.

The reports shall identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance. If no exceedances occurred during the reporting period, then a report is required stating so.

2. The permittee shall submit annual reports that identify the total coating and cleanup material usage for each calendar year, in gallons. These reports shall be submitted by January 31 of each year for the preceding calendar year.

E. **Testing Requirements**

1. Compliance with the hourly and daily OC emission limitations in these terms and conditions shall be determined by the required record keeping in T&C C.2. Compliance with the annual OC emission limitation is ensured if compliance is maintained with the OC content and annual usage limitations for coatings and cleanup materials.

2. Formulation data or USEPA method 24 (for coatings) shall be used to determine the OC contents of the materials, including cleanup materials, employed in this emissions unit.

3. Compliance with the HAP usage limitations specified in T&C A.2.c shall be determined by the required record keeping in T&C C.1.

4. Compliance with the annual coating and cleanup material usage restriction in T&C B.1 shall be determined by the required record keeping in T&C C.3.

F. **Miscellaneous Requirements**

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of OAC rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application.

   Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

   Pollutant: isobutanol
   TLV (ug/m3): 152
   Maximum Hourly Emission Rate (lbs/hr): 1.42
   Predicted 1-Hour Maximum Ground-Level
   Concentration (ug/m3): 163
   MAGLC (ug/m3): 3619

   Pollutant: toluene
   TLV (ug/m3): 188
   Maximum Hourly Emission Rate (lbs/hr): 3.03
   Predicted 1-Hour Maximum Ground-Level
   Concentration (ug/m3): 347
   MAGLC (ug/m3): 4476
   OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

   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 specified in the above table;

   b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);

   c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and

   d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.
   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.