

Facility ID: 1431070599 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.

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[Go to Part II for Emissions Unit K005](#)

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Facility ID: 1431070599 Emissions Unit ID: K004 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>
K004 - Miscellaneous Metal Parts Coating Operation	OAC rule 3745-31-05(A)(3) (PTI 14-05737)	Volatile Organic Compound (VOC) emissions shall not exceed 14.9 lbs/day for coatings. VOC emissions shall not exceed 6.7 lbs/day for cleanup material. VOC emissions shall not exceed 3.95 TPY, including coatings and cleanup materials. See terms and conditions A.2.b., A.2.c. and B.2. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e)(ii).
	OAC rule 3745-21-09(U)(2)(e)(ii)	See term and condition B.1

2. **Additional Terms and Conditions**
 - (a) Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by coating and cleanup material usage restrictions, the VOC content limitations and emissions limitations.
 The VOC content of each coating, as applied, shall not exceed 4.98 pounds of VOC per gallon.
 The VOC content of each cleanup material shall not exceed 6.7 pounds of VOC per gallon.

B. Operational Restrictions

1. The maximum coating usage for this emissions unit shall not exceed 3.0 gallons per day and 1095 gallons per year.
2. The maximum cleanup material usage for this emissions unit shall not exceed 1 gallon per day and 365 gallons per year.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for emissions unit K004:
 - a. The name and identification number of each coating, as applied.
 - b. The VOC content of each coating, as applied, in pounds per gallon.
 - c. The volume of each coating employed, in gallons.
 - d. The total volume of all coatings employed, in gallons.
 - e. The name and identification number of each cleanup material employed.
 - f. The VOC content of each cleanup material, in pounds per gallon.
 - g. The volume of each cleanup material employed, in gallons.

- h. The total VOC emissions from all coatings employed (b x c).
- i. The total VOC emissions from all cleanup materials employed (f x g).
- j. The total VOC emissions from all coatings and cleanup materials employed, in pounds [(b x c) + (f x g)].

These records shall be summarized at the end of the calendar year.

2. The permit to install for emissions unit K004 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 SCREEN3 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN3 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: Toluene

TLV (ug/m3): 188,405

Maximum Hourly Emission Rate (lbs/hr): 6.28

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2181

MAGLC (ug/m3): 4486

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 notify the Hamilton County Department of Environmental Services of any daily record showing that emissions unit K004 employed more than the applicable maximum daily coating or cleanup material usage limit outlined in terms and conditions B.1. and B.2. A copy of such record shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurred. For each usage limit exceedance the permittee shall also identify if an exceedance of the applicable daily VOC emissions limit occurred.
2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing the use of noncomplying coatings or cleanup materials (i.e., VOC contents). 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.
3. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services which specify the total VOC emissions from emissions unit K004 for the previous calendar year. This report shall also specify the total volume, in gallons, of coatings employed in emissions unit K004 and the total volume, in gallons, of cleanup materials employed in emissions unit K004 for the previous calendar year. These reports shall be submitted by January 31 of each year.
4. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit unless otherwise specified.

E. Testing Requirements

1. USEPA methods 24 and 24A shall be used to determine the VOC content for coatings and cleanup materials. If pursuant to 40 CFR Part 60, Appendix A, the permittee 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.

2. Compliance with the emissions limitations in Section A. and usage limitations in Section B. of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emissions Limitation:
14.9 lbs/day VOC, coatings

Applicable Compliance Method:
The daily VOC emissions limitation for coatings was determined by multiplying the maximum VOC content of applied coating identified in term and condition A.2.b. by the maximum daily coating application rate identified in term and condition B.1 [(4.98 lb/gal)(3 gal/day)]. Compliance shall be based upon the record keeping requirements as specified in term and condition C.1.
 - b. Emissions Limitation:
6.7 lbs/day VOC, cleanup material

Applicable Compliance Method:
The daily VOC emissions limitation for cleanup was determined by multiplying the maximum VOC content identified in term and condition A.2.c. by the maximum daily cleanup usage rate identified in term and condition B.2 [(6.7 lb/gal)(1 gal/day)]. Compliance shall be based upon the record keeping requirements as specified in term and condition C.1.
 - c. Emissions Limitation:
3.95 TPY VOC, including coatings and cleanup materials

Applicable Compliance Method:
Compliance with the annual VOC emissions limitation shall be determined by adding the annual emissions from coating and cleanup usage. Annual VOC emissions from coating shall be determined by multiplying the VOC content of applied coatings by the annual usage. Annual VOC emissions from cleanup are determined by multiplying the VOC content of the cleanup by the annual usage. The annual emissions from the coating and cleanup are then added and divided by 2000 lb/ton to determine compliance with the annual emissions limitation. Compliance shall be based upon the record keeping requirements as specified in term and condition C.1.
 - d. Usage Limitations:
3.0 gallons/day and 1095 gallons/yr, of coatings; and
1 gallon/day and 365 gallons/yr, of cleanup materials.

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements as specified in term and condition C.1.

F. Miscellaneous Requirements

None

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Facility ID: 1431070599 Emissions Unit ID: K005 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>
K005 - Miscellaneous Metal Parts Coating Operation	OAC rule 3745-31-05(A)(3) (PTI 14-05737)	Volatile Organic Compound (VOC) emissions shall not exceed 14.9 lbs/day for coatings. VOC emissions shall not exceed 6.7 lbs/day for cleanup material.

VOC emissions shall not exceed 3.95 TPY, including coatings and cleanup materials.

See terms and conditions A.2.b., A.2.c. and B.2.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e)(ii).

OAC rule 3745-21-09(U)(2)(e)(ii) See term and condition B.1

2. Additional Terms and Conditions

- (a) Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by coating and cleanup material usage restrictions, the VOC content limitations and emissions limitations.
The VOC content of each coating, as applied, shall not exceed 4.98 pounds of VOC per gallon.
The VOC content of each cleanup material shall not exceed 6.7 pounds of VOC per gallon.

B. Operational Restrictions

1. The maximum coating usage for this emissions unit shall not exceed 3.0 gallons per day and 1095 gallons per year.
2. The maximum cleanup material usage for this emissions unit shall not exceed 1 gallon per day and 365 gallons per year.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for emissions unit K005:
 - a. The name and identification number of each coating, as applied.
 - b. The VOC content of each coating, as applied, in pounds per gallon.
 - c. The volume of each coating employed, in gallons.
 - d. The total volume of all coatings employed, in gallons.
 - e. The name and identification number of each cleanup material employed.
 - f. The VOC content of each cleanup material, in pounds per gallon.
 - g. The volume of each cleanup material employed, in gallons.
 - h. The total VOC emissions from all coatings employed (b x c).
 - i. The total VOC emissions from all cleanup materials employed (f x g).
 - j. The total VOC emissions from all coatings and cleanup materials employed, in pounds [(b x c) + (f x g)].

These records shall be summarized at the end of the calendar year.

2. The permit to install for emissions unit K005 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 SCREEN3 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN3 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: Toluene

TLV (ug/m3): 188,405

Maximum Hourly Emission Rate (lbs/hr): 6.28

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2181

MAGLC (ug/m3): 4486

Physical changes to or in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used, 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 its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services of any daily record showing that emissions unit K005 employed more than the applicable maximum daily coating or cleanup material usage limit outlined in terms and conditions B.1. and B.2. A copy of such record shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurred. For each usage limit exceedance the permittee shall also identify if an exceedance of the applicable daily VOC emissions limit occurred.
2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing the use of noncomplying coatings or cleanup materials (i.e., VOC contents). 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.
3. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services which specify the total VOC emissions from emissions unit K005 for the previous calendar year. This report shall also specify the total volume, in gallons, of coatings employed in emissions unit K005 and the total volume, in gallons, of cleanup materials employed in emissions unit K005 for the previous calendar year. These reports shall be submitted by January 31 of each year.
4. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit unless otherwise specified.

E. Testing Requirements

1. USEPA methods 24 and 24A shall be used to determine the VOC content for coatings and cleanup materials. If pursuant to 40 CFR Part 60, Appendix A, the permittee 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.

2. Compliance with the emissions limitations in Section A. and usage limitations in Section B. of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emissions Limitation:
14.9 lbs/day VOC, coatings

Applicable Compliance Method:

The daily VOC emissions limitation for coatings was determined by multiplying the maximum VOC content of applied coating identified in term and condition A.2.b. by the maximum daily coating application rate identified in term and condition B.1 [(4.98 lb/gal)(3 gal/day)]. Compliance shall be based upon the record keeping requirements as specified in term and condition C.1.

- b. Emissions Limitation:
6.7 lbs/day VOC, cleanup material

Applicable Compliance Method:

The daily VOC emissions limitation for cleanup was determined by multiplying the maximum VOC content identified in term and condition A.2.c. by the maximum daily cleanup usage rate identified in term and condition B.2 [(6.7 lb/gal)(1 gal/day)]. Compliance shall be based upon the record keeping requirements as specified in term and condition C.1.

- c. Emissions Limitation:
3.95 TPY VOC, including coatings and cleanup materials

Applicable Compliance Method:

Compliance with the annual VOC emissions limitation shall be determined by adding the annual emissions from coating and cleanup usage. Annual VOC emissions from coating shall be determined by multiplying the VOC content of applied coatings by the annual usage. Annual VOC emissions from cleanup are determined by multiplying the VOC content of the cleanup by the annual usage. The annual emissions from the coating and cleanup are then added and divided by 2000 lb/ton to determine compliance with the annual emissions limitation. Compliance shall be based upon the record keeping requirements as specified in term and condition C.1.

- d. Usage Limitations:
3.0 gallons/day and 1095 gallons/yr, of coatings; and
1 gallon/day and 365 gallons/yr, of cleanup materials.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements as specified in term and condition C.1.

F. Miscellaneous Requirements

None