Facility ID: 1431071007 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: 1431071007 Emissions Unit ID: K003 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 |
|---|---|---|
| K003-Paint Spray Booth | OAC rule 3745-31-05(A)(3) 14-05872 | Volatile organic compound (VOC) emissions shall not exceed 8 lbs/hr and 40 lbs/day. |
| | OAC rule 3745-31-05(C) | See term and condition A.2.b and A.2.c. |
| | OAC rule 3745-21-15 | Exempt. See term and condition A.2.c. |
| | OAC rule 3745-17-11(C) | See term and condition A.2.d.<br>See sections C.5, C.6 and C.7. |

2. **Additional Terms and Conditions**

   (a) Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emission limitations.
   The total usage of hazardous air pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from K001 (Paint Spray Booth 1), K002 (Paint Spray Booth 2), K003 (Paint Spray Booth 3), R001 (Wood Coating Dip Tank 1), R002 (Wood Coating Dip Tank 2), R003 (Wood Coating Dip Tank 3), R004 (Wood Coating Dip Tank 4), R005 (Wood Coating Dip Tank 5), R006 (Wood Coating Dip Tank 6) and any registration status and/or permit exempt emissions units, 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.
   The facility-wide total volatile organic compound (VOC) emissions, including emissions units K001 (Paint Spray Booth 1), K002 (Paint Spray Booth 2), K003 (Paint Spray Booth 3), R001 (Wood Coating Dip Tank 1), R002 (Wood Coating Dip Tank 2), R003 (Wood Coating Dip Tank 3), R004 (Wood Coating Dip Tank 4), R005 (Wood Coating Dip Tank 5), R006 (Wood Coating Dip Tank 6) and any registration status and/or permit exempt emissions units, shall not exceed 24.9 TPY on a rolling, 12-month summation basis.
   The permittee shall operate, and maintain a dry particulate filter for the coating operations in accordance with the manufacturer's recommendations, instructions, and/or operating manual, with any modifications deemed necessary by permittee. The dry filtration system shall be employed during all periods of coating application to control particulate emissions.

B. **Operational Restrictions**

1. None

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

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

   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 each day for this emissions unit:

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 VOC content of each coating and cleanup material, in pounds of VOC per gallon of coating or cleanup material;

d. The total VOC emission rate for all coatings and cleanup materials, in pounds of VOC 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 VOC 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 following information each month for the emissions units identified in term and condition A.2.c:

a. The name and identification number of each coating employed;

b. The total volatile organic compound (VOC) content in pounds per gallon in each coating, as applied;

c. The number of gallons of each coating employed;

d. The name and identification number of each cleanup material employed;

e. The total volatile organic compound (VOC) content in pounds per gallon in each cleanup material, as applied;

f. The number of gallons of each cleanup material employed;

g. The total VOC emissions from all coatings and cleanup materials employed, in pounds or tons [the sum of (b) times (c) for all coatings plus the sum of (e) times (f) for all cleanup materials, and divided by 2,000 pounds per ton if the units are in tons];

h. The updated rolling, 12-month summation of the total VOC emissions, in tons. This shall include the information for the current month and the preceding eleven calendar months.

4. The permit to install for emissions units K002 and K003 was evaluated based on the actual materials (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. 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: 2-Butoxyethanol
TLV (ug/m3): 96,663

Maximum Allowable Hourly Emission Rate (lbs/hr): 0.48
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 316
MAGLC (ug/m3): 2301
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 (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 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.

5. The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry filtration system with any modifications deemed necessary by the permittee during the time period in which the dry filtration system is utilized. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

6. The permittee shall conduct periodic inspections of the dry filtration system to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee. The periodic inspections of the dry filtration system shall be performed at a frequency that is based upon the recommendation of the manufacturer, and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency. In addition to these periodic inspections, the permittee shall conduct a comprehensive inspection of the dry filtration system, not less than once each calendar year, while the emissions unit is shut down; and shall perform any needed maintenance and repair for the control device to ensure that it is operated in accordance with the manufacturer's recommendations.

   The permittee shall document each inspection of the dry filtration system by maintaining a record that includes the date of the inspection, a description of each problem identified and the date it was corrected, a description of the maintenance and repairs performed, and the name of the person who performed the inspection. These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

7. In the event that the dry filtration system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee, the dry filtration system shall be expeditiously repaired or otherwise returned to operation in accordance with such requirements. The permittee shall maintain a record of those periods when the dry filtration system is not operating in accordance with such requirements. These records shall be maintained at the facility for not less than five years from the date of completion and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

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 VOC emissions from the coatings and cleanup materials exceeded 8 pounds per hour, and the actual average hourly VOC emissions for each such day; and

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

   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. All quarterly deviation reports shall be submitted in accordance with paragraph A.2 of the General Terms and

Conditions of this permit.

3. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP emission limitations outlined in term and condition A.2.b. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively.)

4. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the VOC emission limitation outlined in term and condition A.2.c. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31 and October 31of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively.)

E. **Testing Requirements**

1. Compliance with the emission limitations specified in Section A.1 shall be determined by the following methods:

   Emission Limitations:
   8 lbs/hr and 40 lbs/day of VOC emissions from coatings and cleanup materials in this emissions unit.

   Applicable Compliance Method:
   Compliance with the VOC emission limitations shall be determined by the record keeping requirements specified in term and condition C.2.

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

3. Compliance with the HAP usage limitations specified in term and condition A.2.b shall be determined by the required record keeping in term and condition C.1.

4. Compliance with the VOC emission limitations specified in term and condition A.2.c shall be determined by the required record keeping in term and condition C.3.

F. **Miscellaneous Requirements**

1. The following terms and conditions of this permit are federally enforceable: A, B, C.1 - C.3, C.5-C.7, D and E.