

Facility ID: 1431072125 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.

[Go to Part II for Emissions Unit K001](#)

[Go to Part II for Emissions Unit P003](#)

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Facility ID: 1431072125 Emissions Unit ID: K001 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K001-dip coating tank	OAC rule 3745-31-05(A)(3) (PTI 14-4442)	Volatile organic compound emissions (VOC) shall not exceed 350 pounds per week and 9.1 tons per year. See terms A.2.a and A.2.b. See section B.1.
	OAC rule 3745-21-09(U)(1)(c) OAC rule 3745-31-05(C)	The requirements of this rule also include compliance with OAC rules 3745-21-09(U)(1)(c) and 3745-31-05 (C). See term A.2.b. See term A.2.a.

2. Additional Terms and Conditions

- (a) The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units P001, P002, P003, K001, K002, other de minimus air contaminant source, as defined in OAC rule 3745-15-05, and other air contaminant sources exempt from the requirement to obtain a permit-to-install pursuant to OAC rule 3745-31-03 installed subsequent to the issuance of this permit, 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.
The Volatile Organic Compound (VOC) content as applied, of each coating employed shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents.

B. Operational Restrictions

1. The maximum weekly coating usage shall not exceed 100 gallons, excluding water and exempt solvents.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for the purpose of determining weekly VOC emissions:
 - a. The name and identification number of each coating, as applied.
 - b. The VOC content of each coating (excluding water and exempt solvents), in pounds per gallon, as applied.
 - c. The VOC content of each coating (including water and exempt solvents), in pounds per gallon, as applied.
 - d. The number of gallons (including water and exempt solvents), of each coating employed per week.
 - e. The total VOC emissions for all coatings, in pounds per week [summation of (c x d)] for all coatings.
 - f. The total number of gallons of all coatings employed, excluding water and exempt solvents.

These weekly records shall be summarized annually to demonstrate compliance with the annual VOC emissions limitation.

2. The permittee shall collect and record the following information each month for the emissions units identified in term and condition A.2.a:
 - 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 cleaning, washoff and gluing material employed;
 - f. The individual HAP content for each HAP of each cleaning, washoff and gluing material, in pounds of individual HAP per gallon of cleaning material, washoff and gluing material as applied;
 - g. The total combined HAP content of each cleaning, washoff and gluing material, in pounds of combined HAPs per gallon of cleaning, washoff and gluing material, as applied [sum all the individual HAP contents from (f)];
 - h. The number of gallons of each cleaning, washoff and gluing material employed;
 - i. The total individual HAP emissions for each HAP from all coatings and cleaning, washoff and gluing 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 cleaning, washoff and gluing material];
 - j. The total combined HAP emissions from all coatings and cleaning, washoff and gluing 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 cleaning, washoff and gluing 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 preceding eleven calendar 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 preceding eleven calendar months.

Monthly records shall be completed within 15 days following the end of each calendar month.

* 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 an individual emissions unit basis.

D. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any weekly record showing the use of noncomplying coatings (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.
2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any weekly record showing an exceedance of the weekly usage restriction or emission limitation. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.
3. The permittee shall submit quarterly deviation (excursion) reports which identify any exceedance of the rolling, 12-month HAP emission limitations outlined in term and condition A.2.a. The report shall include a copy of each such record along with corrective actions that were taken to achieve compliance. If no exceedances occurred during the reporting period, then a report is required stating so.

The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by February 15, May 15, August 15, and November 15 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).

4. The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. OAC rule 3745-21-10(B) shall be used to determine the VOC contents of the coatings, cleaning, washoff and gluing materials employed in this emissions unit. If, pursuant to 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating, cleaning, washoff or gluing material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for the coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

Method 24 or 24A can be performed by the permittee or other party (i.e., the permittee's coating supplier).

2. Emissions limitations:

Volatile organic compound emissions (VOC) shall not exceed 350 pounds per week and 9.1 tons per year.

Applicable Compliance Method:

The emissions limitation was calculated using the following equations:

$100 \text{ gallons of coatings}^*/\text{week} \times 3.5 \text{ lbs of VOC/gallon of coatings}^* = 350 \text{ lbs of VOC/week.}$

350 lbs of VOC/week x 52 weeks/year x ton/2000 lbs = 9.1 TPY VOC.

* excluding water and exempt solvents

- 3. Compliance with the weekly VOC emission limitation and coating usage restriction in these terms and conditions shall be determined by the required record keeping in section C.1.
- 4. Compliance with the 12-month rolling HAP limitations outlined in term A.2.a shall be demonstrated by the record keeping in section C.2.

F. Miscellaneous Requirements

- 1. None

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Facility ID: 1431072125 Emissions Unit ID: P003 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

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>
P003-wire descaling process with cartridge filter	OAC rule 3745-31-05(A)(3) PTI 14-4522	Particulate Emissions (PE) shall not exceed 0.66 pounds per hour and 2.89 TPY.
	OAC rule 3745-17-07(A)(1)	Particulate emissions 10 microns and less in diameter (PM10) shall not exceed 0.33 pounds per hour and 1.45 tons per year.
	OAC rule 3745-17-11	Visible particulate emissions shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule. The PM emission limitation established by this rule is less stringent than that established pursuant to OAC rule 3745-31-05.

- 2. **Additional Terms and Conditions**
 - (a) None

B. Operational Restrictions

- 1. The pressure drop across the cartridge filter shall be maintained within the range of 0.5 to 5.0 inches of water column while the emissions unit is in operation.

C. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the cartridge filter while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the cartridge filter on a once per day basis.

D. Reporting Requirements

- 1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the cartridge filter did not comply with the allowable range specified above.

The reports shall be submitted by January 31, April 30, July 31 and October 31 and shall cover the previous calendar quarter.

E. Testing Requirements

- 1. Emission Limitation:

Particulate Emissions (PE) shall not exceed 0.66 pounds per hour and 2.89 TPY.

Particulate emissions 10 microns and less in diameter (PM10) shall not exceed 0.33 pounds per hour and 1.45 tons per year.

Applicable Compliance Method:

The above PE and PM10 emissions limitations were calculated using the following equations:

$1579 \text{ lbs of waste collected/week} \times (1-.95) \times \text{week}/120 \text{ hours} = 0.66 \text{ lb of PE/hr.}$

$0.66 \text{ lb of PE/hr} \times 8760 \text{ hrs/year} \times \text{ton}/2000 \text{ lbs} = 2.89 \text{ TPY PE}$

PM10 is assumed to be 50% of PE emissions.

$0.66 \text{ lb of PE/hr} \times (0.50) = 0.33 \text{ lb of PM10/hr.}$

$2.89 \text{ TPY PE} \times (0.50) = 1.45 \text{ TPY PM10}$

2. Emission Limitation:
Visible particulate emissions shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:
Compliance with the above visible particulate emission limitation shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in USEPA Reference Method 9.
 3. Operational Limitation:
The pressure drop across the cartridge filter shall be maintained within the range of 0.5 to 5.0 inches of water column while the emissions unit is in operation.

Applicable Compliance Method:
Compliance with the pressure drop limitation shall be demonstrated by the recordkeeping required in term C.1.
- F. **Miscellaneous Requirements**
1. None