

Facility ID: 1431072466 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: 1431072466 Emissions Unit ID: K001 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>
miscellaneous metal parts spray booth	OAC rule 3745-31-05(A)(3) (PTI 14-1768)	5.27 lbs of volatile organic compound (VOC) emissions/hour* 1.36 tons per year (TPY) of VOC emissions, including VOC emissions from the use of cleanup materials

See section A.2 below.

* The hourly emission limitation specified above is based upon the emissions unit's potential to emit. Therefore, no hourly records are required to demonstrate compliance with this limit.

OAC rule 3745-21-09(U)(2)(f)

See Section A.2.a below.

2. Additional Terms and Conditions

- (a) Pursuant to OAC rule 3745-21-09(U)(2)(f), the Director has determined that "best available technology" for this emissions unit, as defined in PTI #14-1768, is a control requirement or emission limitation that is either less stringent than or inconsistent with the requirements of paragraph (U)(1) of OAC rule 3745-21-09. Specifically, the VOC content limitation in the PTI for coatings is less stringent than the applicable VOC content limitation in paragraph (U)(1) of OAC rule 3745-21-09. The VOC content of each coating and cleanup material employed in this emissions unit shall not exceed the following amounts:

Primers: 5.22 lbs of VOC/gallon, excluding water and exempt solvents, as a daily, volume-weighted average
 Topcoats: 5.27 lbs of VOC/gallon, excluding water and exempt solvents, as a daily, volume-weighted average
 Cleanup Materials: 6.47 lbs of VOC/gallon

B. Operational Restrictions

1. The usage of all coatings and cleanup materials employed in this emissions unit shall not exceed the following amounts:

Primers: 150 gallons/year, excluding water and exempt solvents
 Topcoats: 350 gallons/year, excluding water and exempt solvents
 Cleanup Materials: 15 gallons/year

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the name and identification number of each primer;
 - b. the name and identification number of each topcoat;
 - c. the VOC content of each primer, in pounds per gallon, excluding water and exempt solvents, as applied;
 - d. the VOC content of each topcoat, in pounds per gallon, excluding water and exempt solvents, as applied;

- e. the number of gallons of each primer employed, excluding water and exempt solvents;
 - f. the number of gallons of each topcoat employed, excluding water and exempt solvents; and
 - g. the daily, volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for Cvoc,2.
2. The permittee shall collect and record the following information each month for this emissions unit:
- a. the name and identification number of each cleanup material employed;
 - b. the number of gallons of each cleanup material employed;
 - c. the VOC content of each cleanup material, in pounds per gallon;
 - d. the total number of gallons of all cleanup materials employed (summation of (b) for the calendar month); and
 - e. the total VOC emissions from all primers, topcoats and cleanup materials employed, in pounds [the summation of (C.1.c x C.1.e) for all primers, plus the summation of (C.1.d x C.1.f) for all topcoats, plus the summation of (C.2.b x C.2.c) for all cleanup materials].
3. The permittee shall maintain annual records of the following information for this emissions unit:
- a. the total number of gallons of all primers employed, excluding water and exempt solvents (summation of C.1.e for all days during the calendar year);
 - b. the total number of gallons of all topcoats employed; excluding water and exempt solvents (summation of C.1.f for all days during the calendar year);
 - c. the total number of gallons of all cleanup materials employed (summation of C.2.d for all months during the calendar year); and
 - d. the total VOC emissions from all primers, topcoats and cleanup materials employed, in tons [the summation of (C.2.e) for all months of the calendar year and divided by 2,000 lbs/ton].
- D. Reporting Requirements**
- 1. The permittee shall notify the Hamilton County Department of Environmental Services of any daily record showing an use of non-complying coatings (primer or topcoat) or cleanup materials (i.e., for 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 following the end of the calendar month during which the exceedance(s) occurred.
 - 2. The permittee shall submit annual reports that specify the total number of gallons of all primers, topcoats and cleanup materials employed during the previous calendar year for this emissions unit. In addition, the permittee shall submit annual reports that specify the total VOC emissions for the calendar year. These reports shall be submitted by January 31 of each year and cover the previous calendar year.
- E. Testing Requirements**
- 1. Compliance with the hourly and annual VOC emission limitations, VOC content limitations and material usage restrictions specified in Sections A and B shall be determined in accordance with the following methods:
 - a. VOC Emission Limitation: 5.27 lbs of VOC emissions/hour

Applicable Compliance Method: The hourly VOC emission limitation is based upon the emissions unit's potential to emit and was determined by multiplying the maximum VOC content of the topcoat (5.27 lbs of VOC/gallon, excluding water and exempt solvents) by the maximum amount of coating to be applied in one hour (1 gallon, excluding water and exempt solvents).

 - b. VOC Emission limitation: 1.36 TPY of VOC emissions, including VOC emissions from the use of cleanup materials
- Applicable Compliance Method: Compliance with the annual VOC emission limitation shall be determined by the record keeping requirements specified in Section C.3. In addition, compliance with the annual VOC emission limitation is ensured if compliance is maintained with the VOC content limitations and material usage restrictions for the primers, topcoats and cleanup materials specified in this permit.
- d. Material Usage Restrictions:
- Primers: 150 gallons/year, excluding water and exempt solvents
 - Topcoats: 350 gallons/year, excluding water and exempt solvents
 - Cleanup Materials: 15 gallons/year
- Applicable Compliance Method: Compliance with the annual material usage restrictions shall be determined by the record keeping requirements specified in Section C.3.
- c. VOC Content Limitations:
- Primers: 5.22 lbs of VOC/gallon, excluding water and exempt solvents, as a daily, volume-weighted average
 - Topcoats: 5.27 lbs of VOC/gallon, excluding water and exempt solvents, as a daily, volume-weighted average
 - Cleanup Materials: 6.47 lbs of VOC/gallon
- Applicable Compliance Method: Compliance with the VOC content limitations shall be based on the record keeping requirements specified in Sections C.1 and C.2. In accordance with OAC rule 3745-21-04(B)(5), U.S. EPA Method 24 shall be used to determine the VOC contents of the coatings. If, pursuant to Section 4.3 of Method 24, 40 CFR, Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the U.S. EPA and shall use formulation

data for that coating to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24. Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of any cleanup material.

F. **Miscellaneous Requirements**

1. None