Facility ID: 1431074008 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: 1431074008 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Paint booth for metal cylinders	OAC rule 3745-31-05 (PTI 14-4588)	38.63 lbs of volatile organic compounds (VOC)/day and 7.05 TPY VOC for emissions unit K001 and K002 combined. 0.551 lb PM-PM10/hr, 2.41 TPY PM-PM10. See section A.2.c.
	OAC rule 3745-21-09 (U) (1) (c)	See section A.2.a.
	OAC rule 3745-17-11(B)(1)	Same as PM limitation as established pursuant to OAC rule 3745-31-05.
	OAC rule 3745-17-07(A)	See section A.2.b. below.

2. **Additional Terms and Conditions**

   (a) The VOC content of each coating employed shall not exceed 3.5 lbs/gallon (excluding water and exempt solvents), as applied.
   Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as specified by rule.
   The VOC content of each cleanup material employed in this emissions unit shall not exceed 7.25 lbs/gallon.

B. **Operational Restrictions**

1. The maximum daily combined coating usage for emissions units K001 and K002 shall not exceed 10 gallons.

2. The maximum daily combined cleanup material usage for emissions units K001 and K002 shall not exceed 0.5 gallon.

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

1. The permittee shall collect and record the following information each day for emissions units K001 and K002:

   a. The name and identification number of each coating employed.
   b. The VOC content of each coating (in lbs VOC/gallon of coating, excluding water and exempt solvents), as applied.
   c. The number of gallons (including and excluding water and exempt solvents) of each coating employed.
   d. The name and identification of each cleanup material employed.
   e. The VOC content of each cleanup material, in pounds per gallon.
   f. The number of gallons of each cleanup material employed.
   g. The total combined VOC emissions from coatings and cleanup materials (i.e., summation of b x c for each coating and of e x f for each cleanup material), in pounds.
   h. The total combined coating usage (i.e., summation of c for each coating), in gallons (including water and exempt solvents).
   i. The total combined cleanup material usage (i.e., summation of f for each cleanup material), in gallons.

D. **Reporting Requirements**

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing:

a. the use of noncomplying coatings and/or cleanup materials (for VOC content);

b. an exceedance of the applicable maximum daily coating and/or cleanup material usage limits; and/or

c. an exceedance of the daily VOC emission limit.

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.

E. **Testing Requirements**

1. Compliance with the VOC emission limits in Section A.1. shall be determined by the record keeping performed pursuant to section C.1.

2. Compliance with the PM/PM10 emission limits in Section A.1. shall be determined in accordance with the following:

Emission Limitation: 0.551 lb of PM/PM10/hr

Applicable Compliance Method:
Compliance shall be determined in accordance with the following equation: lbs PM/PM10/hr = summation of (maximum hourly coating usage rate for coating i (in gal/hr) x solids content of coating i (in lbs solids/gal coating) x [1-TE] x [1-CE]) for each coating i employed during an hour, and

where: TE = fractional transfer efficiency of 0.65;
CE = fractional control efficiency of 0.9; and
i denotes a specific coating.

Emission Limitation: 2.41 TPY of PM/PM10

Applicable Compliance Method:
Compliance shall be determined in accordance with the following equation: tons PM/PM10/yr = summation of {(maximum yearly coating usage rate for coating i (in gal/hr) x solids content of coating i (in lbs solids/gal coating) x [1-TE] x [1-CE])/ 2000 lbs/ton} for each coating i employed during a year, and

where: TE = fractional transfer efficiency of 0.65;
CE = fractional control efficiency of 0.9; and
i denotes a specific coating.

3. Compliance with the VOC content limitation in Section A.2. of these terms and conditions shall be determined in accordance with the following method:

USEPA Method 24 shall be used to determine the VOC content for 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 USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

4. Emission Limitation: 20% opacity, as a 6-minute average

Applicable Compliance Method: Compliance with the visible particulate emission limitation shall be determined by the method specified in OAC rule 3745-17-03(B)(1).

F. **Miscellaneous Requirements**

1. This permit allows the use of the coatings and cleanup materials specified by the permittee in the application for PTI number 14-4588. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the VOC emission limitation specified in this permit was established in accordance with the Ohio EPA's "Air Toxics Policy" and is based on both the coating and cleanup material formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for the toxic pollutant based on the screen model and a comparison of the predicted 1-hour maximum ground-level concentration to the MAGLC. The following summarizes the results of the modeling for the pollutant:

Pollutant: Trimethylbenzene

TLV (ug/m3): 123,000
Maximum Hourly Emission Rate (lbs/hr): 0.35
Predicted 1-Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 401.44
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 2929

Any of the following changes may be deemed a "modification" to the emissions unit and, as such, prior notification to and approval from the appropriate Ohio EPA District Office or local air agency are required, including the possible issuance of modifications to PTI number 14-4588 and the operating permit:

a. Any changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup 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 above.
b. Any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of any MAGLC specified above.

c. Any change to the emissions unit or its method of operation that would either require an increase in the emission limitation established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01.

d. Any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup

materials, that would result in the emission of any of the exempted organic compounds included in the definition of "VOC" [OAC rule 3745-21-01(B)(6)].