Facility ID: 1431074011 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: 1431074011 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
misc. metal parts coating line	OAC rule 3745-31-05 (PTI 14-4602)	113.2 lbs of volatile organic compounds (VOC)/day, including cleanup
		7.7 TPY of VOC, including cleanup
		See Section A.2.b.
		See Section B.
		2.41 TPY of particulate emissions (PE)
	OAC rule 3745-17-07(A)(1)	Visible PE shall not exceed 20% opacity, as a six-minute average, except as specified by rule.
	OAC rule 3745-17-11(B)(1)	0.551 lb of PE/hr
	OAC rule 3745-21-09(U)(1)(i)	See Section A.2.a.

2. **Additional Terms and Conditions**

   (a) The VOC content of each coating employed shall not exceed 3.0 lbs of VOC/gallon of coating, excluding water and exempt solvents, as applied.
   The VOC content of each cleanup material employed shall not exceed 6.9 lbs of VOC/gallon of cleanup material.

B. **Operational Restrictions**

1. The maximum daily coating usage shall not exceed 36 gallons.

2. The maximum daily cleanup material usage shall not exceed 0.75 gallon.

3. The maximum annual coating usage shall not exceed 4500 gallons.

4. The maximum annual cleanup material usage shall not exceed 273.75 gallons.

5. The permittee shall operate the filtration system when this emissions unit is in operation.

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 coating, as applied, and each cleanup material employed;

   b. the VOC content, in lbs/gallon, of each coating employed, as applied;

   c. the VOC content, in lbs/gallon (excluding water and exempt solvents), of each coating employed, as applied;

   d. the VOC content, in lbs/gallon, of each cleanup material employed;

   e. the number of gallons of each coating employed;

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

g. the VOC emissions of each coating employed (b X d), in pounds;

h. the total VOC emissions for all the coatings employed, (summation of g for all coatings), in pounds;

i. the VOC emissions of each cleanup material employed (d X f), in pounds;

j. the total VOC emissions for all cleanup materials employed (summation of i for all cleanup materials), in pounds;

k. the total VOC emissions from all coatings and cleanup materials employed (h + j), in pounds;

l. the total number of gallons of all the coatings employed (summation of e for all coatings); and

m. the total number of gallons of all the cleanup material employed (summation of f for all cleanup materials).

2. The permittee shall document whether or not the filtration system was in service when the emissions unit was in operation.

D. **Reporting Requirements**

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing the use of noncomplying coatings and cleanup materials (i.e., for VOC contents). The notification shall include a copy of such record and shall be sent to Hamilton County Department of Environmental Services within 30 days after the exceedance occurs.

2. The permittee shall submit deviation (excursion) reports which identify the following:

a. all exceedances of the daily VOC emission limitation of 113.2 pounds;

b. all exceedances of the daily coating usage restriction of 36 gallons; and

c. all exceedances of the daily cleanup material usage restriction of 0.75 gallon.

3. The permittee shall submit annual reports which specify the following for this emissions unit:

a. the total actual annual VOC emissions;

b. the total actual annual coating usage; and

c. the total actual annual cleanup material usage.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

4. The permittee shall notify Hamilton County Department of Environmental Services in writing of any record showing that the filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to Hamilton County Department of Environmental Services within 30 days after the event occurs.

E. **Testing Requirements**

1. Compliance with the emission limits in Section A of these Terms and Conditions shall be determined in accordance with the following methods:
Emission Limitation:
113.2 lbs of VOC/day

Applicable Compliance Method:
The permittee shall determine compliance based upon the record keeping requirements specified in Section C.1 of this permit.
Emission Limitation:
7.7 TPY of VOC

Applicable Compliance Method:
The permittee shall determine compliance based upon the record keeping requirements specified in Section C.1 and shall be the sum of the daily VOC emissions for the calendar year.
Emission Limitation:
0.551 lb of PE/hr

Applicable Compliance Method:
To calculate the worst case for particulate emissions, the permittee shall use the following equation:

E = (maximum coating solids usage rate, in pounds per hour) x (1-TE) x (1-CE)

where:

E = particulate matter emission rate (lbs/hr)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used, 0.60

CE = control efficiency of the control equipment, 0.90

If required, compliance with the hourly PE limitation shall be determined using the test methods and procedures specified in 40 CFR, Part 60, Appendix A.
Emission Limitation:
2.41 TPY of PE

Applicable Compliance Method:
To calculate the worst case for particulate emissions, the permittee shall use the following equation:

E = (maximum coating solids usage rate, in tons per year) x (1-TE) x (1-CE)

where:

E = particulate matter emission rate (TPY)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used, 0.60

CE = control efficiency of the control equipment, 0.90
Emission Limitation:
Visible PE shall not exceed 20% opacity, as a six-minute average.

Applicable Compliance Method:
The permittee shall determine compliance with the above VE limitation in accordance with OAC rule 3745-17-03 (B)(1).
Emission Limitations:
3.0 lbs of VOC/gallon of coating, excluding water and exempt solvents
6.9 lbs of VOC/gallon of cleanup material

Applicable Compliance Method:
Compliance with the above limitations shall be based upon the record keeping requirements specified in Section C.1 of this permit.

2. USEPA Method 24 or 24A shall be used to determine VOC contents of the coatings and cleanup materials. If, pursuant to section 4.3 of Method 24, 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.

F. **Miscellaneous Requirements**

1. If probable cause exists indicating that this emissions unit is causing or contributing to a nuisance in violation of OAC rule 3745-15-07, the permittee shall be required to submit and implement a control program which will bring the emissions unit into compliance.

2. This permit allows the use of materials (coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of OAC rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitations specified in this permit were established using the Ohio EPA's "Air Toxic Policy" and are based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: Methyl Isobutyl Ketone

TLV (ug/m3): 205,000

Maximum Hourly Emission Rate (lbs/hr): 7.0

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 331

MAGLC (ug/m3): 4881

3. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

a. changes in the composition of the materials used (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 specified in the above table;

b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);

c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and

d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

4. The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;

b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and

c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

5. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:

a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and

b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.