

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: K002 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 coating line (paint spray booth with HVLP paint gun)	OAC rule 3745-31-05 (PTI 14-4788)	41.2 lbs of volatile organic compounds (VOC)/day, including VOC from cleanup  7.52 TPY of VOC, including VOC from cleanup  See Section A.2.b.  See Section B.  See Section A.2.a.
	OAC rule 3745-21-09(U)(1)(i)	

2. **Additional Terms and Conditions**
  - (a) The VOC emissions (as applied) from each coating employed shall not exceed 3.0 pounds of VOC per gallon of coating, excluding water and exempt solvents.  
The VOC emissions from each cleanup material employed shall not exceed 6.9 pounds of VOC per gallon.

**B. Operational Restrictions**

1. The maximum daily coating usage shall not exceed 12 gallons, excluding water and exempt solvents.
2. The maximum daily cleanup usage shall not exceed 0.75 gallon.

**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 cleanup material employed;
  - b. the VOC content (excluding water and exempt solvents) of each coating, as applied, and the VOC content of each cleanup material employed, in pounds per gallon;
  - c. the number of gallons of each coating and total number of gallons of all coatings (excluding water and exempt solvents), and the number of gallons of each cleanup material and total number of gallons of all cleanup materials employed; and
  - d. the total VOC emissions for all coatings and cleanup materials, in pounds per day (summation of b X c for all coatings and 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 following:
  - a. the use of noncomplying coatings or cleanup materials (i.e., for VOC contents);
  - b. an exceedance of the daily VOC emission limitation of 41.2 pounds;

- c. an exceedance of the daily coating usage restriction of 12 gallons; and
- d. an exceedance of the daily cleanup material usage restriction of 0.75 gallon.

The notification shall include a copy of each 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 a report to the Hamilton County Department of Environmental Services of any operation of this emissions unit without the use of the filtration system. The report shall be submitted within 30 days of such operation of this emissions unit.

**E. Testing Requirements**

- 1. Compliance with the emission limits in Section A and the daily usage restrictions in Section B of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitation:  
41.2 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:  
7.52 TPY of VOC

Applicable Compliance Method:

Compliance with this emission limitation is ensured if compliance with the hourly VOC emission limitation is maintained.

Emission Limitation:  
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.

Usage Limitations:

The maximum daily coating usage shall not exceed 12 gallons, excluding water and exempt solvents.  
The maximum daily cleanup usage shall not exceed 0.75 gallon.

Applicable Compliance Demonstration:

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 the 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, 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 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: Toluene-2,4-Diisocyanate

TLV (ug/m3): 36

Maximum Hourly Emission Rate (lbs/hr): 0.0060

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 0.14

MAGLC (ug/m3): 0.86

- 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 the 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 changes identified in F.3. 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 identified in F.3. 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.