

Facility ID: 1431074058 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.

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[Go to Part II for Emissions Unit R002](#)

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Facility ID: 1431074058 Emissions Unit ID: R001 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>
R001-spray booth for surface coating of wooden furniture	OAC rule 3745-31-05(A)(3) (PTI 14-04890)	Organic Compound (OC) emissions shall not exceed 7.2 pounds per hour, excluding cleanup materials and 6.2 tons per year (TPY) of OC emissions, including cleanup materials.
	OAC rule 3745-21-07(G)(2)	See section A.2.a, A.2.b, B.1 and B.2. Exempt. See section B.3.

**2. Additional Terms and Conditions**

- (a) The OC content of each coating employed in this emissions unit shall not exceed 5.7 pounds of OC per gallon.  
 The OC content of each cleanup material employed in this emissions unit shall not exceed 6.6 pounds of OC per gallon.  
 The hourly OC 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 emission limitation.

**B. Operational Restrictions**

1. The maximum coating usage shall not exceed 1,600 gallons per year.
2. The maximum cleanup material usage shall not exceed 480 gallons per year.
3. The use of photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), is prohibited.

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

1. The permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. Ohio EPA's "Review of New Sources of Air Toxics Emissions" policy ("Air Toxics Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant:

Pollutant: 2-Methyl-1-Propanol  
 TLV (ug/m3): 152,000  
 Maximum Hourly Emission Rate (lbs/hr): 2.92  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,813  
 MAGLC (ug/m3): 3,619

The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(d), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

The permittee shall submit annual reports that describe any changes to this emissions unit which affect the air toxic modeling. If no changes were made during the year, then a report shall be submitted stating that no changes were made. This report is due by January 31 of each year and shall cover the previous calendar year.

2. The permittee shall collect and record the following information each month for this emissions unit:
  - a. the company identification for each coating and cleanup material employed;
  - b. the number of gallons of each coating employed;
  - c. the number of gallons of each cleanup material employed;
  - d. the OC content of each coating, in pounds per gallon, as applied;
  - e. the OC content of each cleanup material, in pounds per gallon, as applied;
  - f. the OC emission for all coatings employed, in pounds [the summation of (b x d) for each coating employed during the calendar month];
  - g. the OC emission for all cleanup materials employed, in pounds [the summation of (c x e) for each cleanup material employed during the calendar month];
  - h. the total number of gallons of all coatings employed;
  - i. the total number of gallons of all cleanup materials employed; and
  - j. a record of each liquid organic material employed in this emissions unit indicating whether or not the liquid organic material is a photochemically reactive material as identified in OAC rule 3745-21-01(C)(5).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]
3. The permittee shall maintain annual records of the following information each year for this emissions unit:
  - a. the total number of gallons of all coatings employed [the summation of C.1.h for all months of the calendar year];
  - b. the total number of gallons of all cleanup materials employed [the summation of C.1.i for all months of the calendar year]; and
  - c. the total OC emissions, in tons, from all coatings and cleanup materials employed during the calendar year [summation of C.1.f for all coatings employed for each month of the calendar year, plus the summation of C.1.g for all cleanup materials employed for each month of the calendar year, and divided by 2,000 lbs/ton].

#### D. Reporting Requirements

1. The permittee shall submit annual reports that summarize the following information for this emissions unit:
  - a. the total OC emissions, in tons, from coatings and cleanup materials employed in this emissions unit for the previous calendar year.
  - b. the total number of gallons of coatings employed in this emissions unit for the previous calendar year.
  - c. the total number of gallons of cleanup materials employed in this emissions unit for the previous calendar year.

The reports shall be submitted by January 31 of each year.
2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any record showing the use of noncomplying coatings and/or cleanup materials (i.e., for OC contents) in this emissions unit. 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.
3. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit. This report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of organic compound emissions emitted each such day. This report shall be submitted to the Hamilton County Department of Environmental Services within 45 days after the occurrence.

#### E. Testing Requirements

1. Compliance with the OC emission limitations, OC content limitations and the annual coating and cleanup material usage restrictions specified in sections A and B shall be determined by the following methods:

## Emission Limitation:

Organic Compound (OC) emissions shall not exceed 7.2 pounds per hour, excluding cleanup materials.

## Applicable Compliance Method:

The hourly OC emission limitation reflects the emissions unit's potential to emit and was established by considering the maximum amount of coating to be applied, in gallons, in one hour multiplied by the coatings' maximum OC content (5.7 lbs of OC/gallon).

## Emission Limitation:

Organic Compound (OC) emissions shall not exceed 6.2 tons per year (TPY) of OC emissions, including cleanup materials

## Applicable Compliance Method:

Compliance with the annual OC emission limitation for coatings and cleanup materials shall be determined by the record keeping requirements specified in sections C.2 and C.3. In addition, compliance with the annual OC emission limitation shall be ensured if compliance is maintained with the annual usage limitations for coatings and cleanup materials and their respective OC content limitations.

## Emission Limitation:

The OC content of each coating employed in this emissions unit shall not exceed 5.7 pounds of OC per gallon.

## Applicable Compliance Method:

Compliance with the OC content limitations shall be determined by the record keeping requirements specified in section C.2.

If required, USEPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If, pursuant to Method 24 as outlined in 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

## Emission Limitation:

The OC content of each cleanup material employed in this emissions unit shall not exceed 6.6 pounds of OC per gallon.

## Applicable Compliance Method:

Compliance with the OC content limitations shall be determined by the record keeping requirements specified in section C.2.

If required, USEPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If, pursuant to Method 24 as outlined in 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

## Usage Limitation:

The maximum coating usage shall not exceed 1,600 gallons per year.

## Applicable Compliance Method:

Compliance with the material usage restrictions for coatings shall be determined by the record keeping requirements specified in section C.3.

## Usage Limitation:

The maximum cleanup material usage shall not exceed 480 gallons per year.

## Applicable Compliance Method:

Compliance with the material usage restrictions for cleanup materials shall be determined by the record keeping requirements specified in section C.3.

F. **Miscellaneous Requirements**

1. None

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Facility ID: 1431074058 Emissions Unit ID: R002 Issuance type: Final State Permit To Operate

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**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>
R002- spray booth for surface coating of wooden furniture	OAC rule 3745-31-05(A)(3) (PTI 14-04890)	Organic Compound (OC) emissions shall not exceed 7.2 pounds per hour, excluding cleanup materials and 6.2 tons per year (TPY) of OC emissions, including cleanup materials.
	OAC rule 3745-21-07(G)(2)	See section A.2. Exempt. See section B.3.

**2. Additional Terms and Conditions**

- (a) The OC content of each coating employed in this emissions unit shall not exceed 5.7 pounds of OC per gallon.  
The OC content of each cleanup material employed in this emissions unit shall not exceed 6.6 pounds of OC per gallon.  
The hourly OC 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 emissions limit.

**B. Operational Restrictions**

1. The maximum coating usage shall not exceed 1,600 gallons per year.
2. The maximum cleanup material usage shall not exceed 480 gallons per year.
3. The use of photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), is prohibited.

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

1. The permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. Ohio EPA's "Review of New Sources of Air Toxics Emissions" policy ("Air Toxics Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant:

Pollutant: 2-Methyl-1-Propanol  
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 Maximum Hourly Emission Rate (lbs/hr): 2.92  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,813  
 MAGLC (ug/m3): 3,619

The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(d), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

The permittee shall submit annual reports that describe any changes to this emissions unit which affect the air toxic modeling. If no changes were made during the year, then a report shall be submitted stating that no changes were made. This report is due by January 31 of each year and shall cover the previous calendar year.

2. The permittee shall collect and record the following information each month for this emissions unit:

- a. the company identification for each coating and cleanup material employed;
  - b. the number of gallons of each coating employed;
  - c. the number of gallons of each cleanup material employed;
  - d. the OC content of each coating, in pounds per gallon, as applied;
  - e. the OC content of each cleanup material, in pounds per gallon, as applied;
  - f. the OC emission for all coatings employed, in pounds [the summation of (b x d) for each coating employed during the calendar month];
  - g. the OC emission for all cleanup materials employed, in pounds [the summation of (c x e) for each cleanup material employed during the calendar month];
  - h. the total number of gallons of all coatings employed;
  - i. the total number of gallons of all cleanup materials employed; and
  - j. a record of each liquid organic material employed in this emissions unit indicating whether or not the liquid organic material is a photochemically reactive material as identified in OAC rule 3745-21-01(C)(5).
- [Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

3. The permittee shall maintain annual records of the following information each year for this emissions unit:
- a. the total number of gallons of all coatings employed [the summation of C.1.h for all months of the calendar year];
  - b. the total number of gallons of all cleanup materials employed [the summation of C.1.i for all months of the calendar year]; and
  - c. the total OC emissions, in tons, from all coatings and cleanup materials employed during the calendar year [summation of C.1.f for all coatings employed for each month of the calendar year, plus the summation of C.1.g for all cleanup materials employed for each month of the calendar year, and divided by 2,000 lbs/ton].

**D. Reporting Requirements**

1. The permittee shall submit annual reports that summarize the following information for this emissions unit:
- a. the total OC emissions, in tons, from coatings and cleanup materials employed in this emissions unit for the previous calendar year.
  - b. the total number of gallons of coatings employed in this emissions unit for the previous calendar year.
  - c. the total number of gallons of cleanup materials employed in this emissions unit for the previous calendar year.
- The reports shall be submitted by January 31 of each year.
2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any record showing the use of noncomplying coatings and/or cleanup materials (i.e., for OC contents) in this emissions unit. 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.
3. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit. This report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of organic compound emissions emitted each such day. This report shall be submitted to the Hamilton County Department of Environmental Services within 45 days after the occurrence.

**E. Testing Requirements**

1. Compliance with the OC emission limitations, OC content limitations and the annual coating and cleanup material usage restrictions specified in sections A and B shall be determined by the following methods:
- Emission Limitation:
- Organic Compound (OC) emissions shall not exceed 7.2 pounds per hour, excluding cleanup materials.
- Applicable Compliance Method:
- The hourly OC emission limitation reflects the emissions unit's potential to emit and was established by considering the maximum amount of coating to be applied, in gallons, in one hour multiplied by the coatings' maximum OC content (5.7 lbs of OC/gallon).
- Emission Limitation:
- Organic Compound (OC) emissions shall not exceed 6.2 tons per year (TPY) of OC emissions, including cleanup materials
- Applicable Compliance Method:
- Compliance with the annual OC emission limitation for coatings and cleanup materials shall be determined by the record keeping requirements specified in sections C.2 and C.3. In addition, compliance with the annual OC emission limitation shall be ensured if compliance is maintained with the annual usage limitations for coatings and cleanup materials and their respective OC content limitations.

**Emission Limitation:**

The OC content of each coating employed in this emissions unit shall not exceed 5.7 pounds of OC per gallon.

**Applicable Compliance Method:**

Compliance with the OC content limitations shall be determined by the record keeping requirements specified in section C.2.

If required, USEPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If, pursuant to Method 24 as outlined in 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

**Emission Limitation:**

The OC content of each cleanup material employed in this emissions unit shall not exceed 6.6 pounds of OC per gallon.

**Applicable Compliance Method:**

Compliance with the OC content limitations shall be determined by the record keeping requirements specified in section C.2.

If required, USEPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If, pursuant to Method 24 as outlined in 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

**Usage Limitation:**

The maximum coating usage shall not exceed 1,600 gallons per year.

**Applicable Compliance Method:**

Compliance with the material usage restrictions for coatings shall be determined by the record keeping requirements specified in section C.3.

**Usage Limitation:**

The maximum cleanup material usage shall not exceed 480 gallons per year.

**Applicable Compliance Method:**

Compliance with the material usage restrictions for cleanup materials shall be determined by the record keeping requirements specified in section C.3.

**F. Miscellaneous Requirements**

1. None