

Facility ID: 1431074172 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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Facility ID: 1431074172 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>
K001 - Metal and Non-metal Parts Paint Spray Booth	OAC rule 3745-31-05(A)(3) (PTI 14-05650)	Organic compound (OC) emissions shall not exceed 23.8 lbs/day, including cleanup. OC emissions shall not exceed 4.34 tons per year (TPY), including cleanup See terms and conditions A.2.b and A.2.c
	OAC rule 3745-21-07(G)(2)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e)(ii).
	OAC rule 3745-21-09(U)(2)(e)(ii)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). See term and condition B.1

2. Additional Terms and Conditions

- (a) Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emission limitations, OC content limitations and the coating usage limitation. The OC content, as applied, of each coating and cleanup material employed in this emissions unit shall not exceed 6.8 pounds of OC per gallon of coating. Organic compound (OC) emissions shall not exceed 8 lbs/hr when applying coatings and cleanup materials identified as Photochemically Reactive Materials (PRM) to non-metal parts.

B. Operational Restrictions

1. The maximum daily coating usage for this emissions unit shall not exceed 3 gallons per day when coating miscellaneous metal parts.

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 and cleanup material;
 - b. the volume in gallons, of each coating employed;
 - c. the total volume, in gallons, of all of the coatings employed;
 - d. the volume in gallons, of each cleanup material employed;
 - e. the OC content of each coating employed, in pounds OC per gallon, as applied;
 - f. the OC content of each cleanup material employed, in pounds OC per gallon;
 - g. the total OC emissions from the coatings and cleanup materials, in pounds OC per day

[(c x e) + (d x f)];

- h. for each day when coating non-metal parts, the total number of hours the emissions unit was in operation;
- i. for each day when coating non-metal parts, the average hourly organic compound emission rate for all coatings and cleanup materials, i.e., (g)/(h), in pounds per hour (average);
- j. identification of the coated parts as metal or non-metal; and
- k. the total volume, in gallons, of all of the coatings employed for miscellaneous metal parts.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

2. The permittee shall maintain monthly records of the total OC emissions and the total volume, in gallons, of all coatings and cleaning materials employed in this emissions unit. The monthly emissions and usage records shall be summarized at the end of each calendar year.
3. The permit to install for this emissions unit (K001) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic 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 Ground-Level Concentration (MAGLC).

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

Pollutant: Toluene

TLV (ug/m3): 188,000

Maximum Hourly Emission Rate (lbs/hr): 8

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3734

MAGLC (ug/m3): 4476

Physical changes to or in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in 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 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 previously modeled;
- 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.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is(are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services of any daily record showing that this emissions unit employed more than the applicable maximum daily coating usage limit outlined in term and condition B.1 when coating metal parts. A copy of such record shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurred.
2. The permittee shall notify the Hamilton County Department of Environmental Services of any daily record showing an identification of each hour during which the organic compound emissions from the non-metal parts coatings when applying photochemically reactive materials exceeded 8 pounds per hour, and the actual organic compound emissions for each such hour. A copy of such record shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance(s) occurred.
3. The permittee shall notify the Hamilton County Department of Environmental Services of any daily record showing

that emissions unit K001 exceeded the applicable maximum daily OC emission limitation outlined in term and condition A.1. A copy of such record shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurred.

4. The permittee shall notify the Hamilton County Department of Environmental Services of any daily record showing that emissions unit K001 employed coatings that exceeded the applicable maximum OC content limits outlined in term and condition A.2.b. A copy of such record shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance(s) occurred.
5. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services which specify the total OC emissions from emissions unit K001 for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Compliance with the emission limitations and other limitations in term and conditions A. and B. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emissions Limitation

8 lbs OC emissions/hr when applying PRM coatings on non-metal parts
23.8 lbs OC emissions/day

Applicable Compliance Method

Compliance with the OC emissions limitations shall be demonstrated by the record keeping requirement in term and condition C.1.
 - b. Emissions Limitation

4.34 tons per year (TPY) OC emissions

Applicable Compliance Method

Compliance with the annual OC emissions limitation shall be demonstrated by the record keeping requirement in term and condition C.2.
 - c. OC Content Limitation

6.8 pounds OC per gallon of coating, of each coating applied to metal parts

Applicable Compliance Method

Compliance with the OC content limitation shall be determined by the record keeping requirements specified in terms and conditions C.1.
2. Formulation data or USEPA method 24 (for coatings) shall be used to determine the OC contents of the materials, including cleanup materials, employed in this emissions unit
3. Compliance with the usage limitations in term and condition B.1 shall be demonstrated by the record keeping in term and condition C.1.

F. Miscellaneous Requirements

1. None

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 - (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 - Wood Parts Paint Spray Booth with gas-fired oven	OAC rule 3745-31-05(A)(3) (PTI 14-05650)	Organic Compound (OC) emissions shall not exceed 7.3 tons per year (TPY).
	OAC rule 3745-21-07(G)(2)	See term and condition A.2.a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2). Organic Compound (OC) emissions shall not exceed 8 pounds/hour and 40 pounds/day.

2. Additional Terms and Conditions

- (a) The OC content of each coating and cleanup material employed in this emissions unit shall not exceed 6.8 pounds of OC per gallon. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the OC content limitation and the emissions limitations.

B. Operational Restrictions

- 1. None

C. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. the company identification for each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup material employed;
 - c. the OC content of each coating and cleanup material, in pounds of OC per gallon of coating or cleanup material;
 - d. the total OC emission rate for all coatings and cleanup materials, in pounds of OC emissions per day [summation of (b) x (c) for all coatings and cleanup materials];
 - e. the total number of hours the emissions unit was in operation; and
 - f. the average hourly OC emission rate for all coatings and cleanup materials, i.e., (d)/(e), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]
- 2. The permittee shall maintain monthly records of the total OC emissions and the total volume, in gallons, of all coatings and cleanup materials employed in this emissions unit. The monthly emissions and usage records shall be summarized at the end of each calendar year.
- 3. The permit to install for this emissions unit, R001, 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. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic 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 Ground-Level Concentration (MAGLC).

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

Pollutant: Toluene
 TLV (ug/m3): 188,000
 Maximum Hourly Emission Rate (lbs/hr): 8
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1782
 MAGLC (ug/m3): 4476

Physical changes to or in the method of operation of the emissions unit after it's installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for 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 previously modeled;
- 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.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-

05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that contain the following information:
 - a. an identification of each day during which the average hourly OC emissions from the coatings and cleanup materials exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day;
 - b. an identification of each day during which the OC emissions from the coatings and cleanup materials exceeded 40 pounds per day, and the actual OC emissions for each such day; and
 - c. an identification of any exceedance of the coating and cleanup material OC content limitation.

The reports shall identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance. If no exceedances occurred during the reporting period, then a report is required stating so.
2. The deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.
3. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services which specify the total OC emissions from emissions unit R001 for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Compliance with the emission limitations specified in Section A.1 shall be determined by the following methods:
 - a. Emission Limitations:

8 lbs/hr and 40 lbs/day of OC emissions from coatings and cleanup materials;
7.3 TPY of OC emissions from coatings and cleanup material.

Applicable Compliance Method:

Compliance with the OC emissions limitations shall be determined by the record keeping requirements specified in terms and conditions C.1 and C.2.
 - b. Emission Limitation:

6.8 lbs of OC/gallon, for the coatings and cleanup materials.

Applicable Compliance Method:

Compliance with the OC content limitation shall be determined by the record keeping requirements specified in terms and conditions C.1.
2. Formulation data or USEPA method 24 (for coatings) shall be used to determine the OC contents of the materials, including cleanup materials, employed in this emissions unit.

F. Miscellaneous Requirements

1. None