

Facility ID: 1431093366 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: 1431093366 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>
Coating Line	OAC rule 3745-31-05(A)(3) (PTI 14-1725)	Volatile organic compound (VOC) emissions shall not exceed 4.02 tons per year (TPY).
	OAC rule 3745-21-09(U)(1)	See A.2. Same as the VOC content limitations established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- (a) The VOC content, as applied, of each coating employed in this emissions unit, except lacquer clear coatings used on bronze rails, shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents.
The VOC content, as applied, of each lacquer clear coating used on bronze rails in this emissions unit shall not exceed 4.3 pounds of VOC per gallon of coating, excluding water and exempt solvents, as a daily, volume-weighted average.

B. Operational Restrictions

1. The permittee shall continue the practice of minimizing VOC emissions from the use of cleanup solvent by spraying solvent into a closeable safety container.
2. The permittee shall not exceed the following usage limitations:
 - a. The maximum usage of lacquer clear coatings used on bronze rails shall not exceed 1 gal/day and 17.7 gal/yr.
 - b. The maximum usage of coatings shall not exceed 10 gal/day and 2000 gal/yr.
 - c. The maximum usage of cleanup solvent shall not exceed 1 gal/day.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for the line:
 - a. The name and identification number of each coating, including lacquer clear coating used on bronze rails, and cleanup solvent, as applied.
 - b. The VOC content, in lbs/gal, excluding water and exempt solvents, of each coating, including lacquer clear coating used on bronze rails, and cleanup solvent.
 - c. The number of gallons, excluding water and exempt solvents, of each coating, including lacquer clear coating used on bronze rails, and cleanup solvent, as applied.
 - d. The total number of gallons of coatings (including lacquer clear coatings used on bronze rails), lacquer clear coatings used on bronze rails, and cleanup solvents.
 - e. The daily, volume-weighted average VOC content of all lacquer clear coatings used on bronze rails, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for C subscript VOC,2, in pounds of VOC per gallon, excluding water and exempt solvents.

2. The permittee shall collect and record the following information each month for the line:
 - a. The name and identification number of each coating, including lacquer clear coating used on bronze rails, and cleanup solvent, as applied.
 - b. The number of gallons of each coating, including lacquer clear coating used on bronze rails, as applied, excluding water and exempt solvents.
 - c. The VOC content of each coating, including lacquer clear coating used on bronze rails, as applied, in pounds of VOC per gallon, excluding water and exempt solvents.
 - d. The number of gallons employed of each coating, including lacquer clear coating used on bronze rails, as applied.
 - e. The total number of gallons employed of coatings, including lacquer clear coating used on bronze rails, as applied.
 - f. The total number of gallons employed of lacquer clear coatings used on bronze rails, as applied.
 - g. The number of gallons of each cleanup solvent employed.
 - h. The VOC content of each cleanup solvent employed, as applied, in pounds of VOC per gallon.
 - i. The total VOC emissions from all coatings, including lacquer clear coatings used on bronze rails, and cleanup solvents, in pounds [summation of (b x c) for all coatings plus the summation of (g x h) for all cleanup solvents.
 3. The permittee shall collect and record the following information each year for the line:
 - a. The total VOC emissions from all coatings, including lacquer clear coatings used on bronze rails, and cleanup solvents, in tons [summation of C.2.i for all months of the calendar year and divided by 2,000 lbs/ton].
 - b. The total number of gallons employed of lacquer clear coatings used on bronze rails [summation of C.2.f for all months of the calendar year].
 - c. The total number of gallons employed of coatings, including lacquer clear coating used on bronze rails [summation of C.2.e for all months of the calendar year].
- D. Reporting Requirements**
1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing that the daily volume-weighted average VOC content of the lacquer clear coating used on bronze rails exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.
 2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing an exceedance of the VOC content limit for coatings, excluding lacquer clear coatings used on bronze rails, or the daily usage limits. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.
 3. The permittee shall submit annual reports that specify the total coating and lacquer clear coating (used on bronze rails) usages and total VOC emissions for the previous year. These reports shall be submitted by January 31 for each preceding year.
- E. Testing Requirements**
1. Compliance with the VOC content and emission limitations in Sections A.1 and A.2 of these terms and conditions shall be determined in accordance with the following method(s):
 VOC Content Limitations:
 4.3 lbs of VOC/gal, excluding water and exempt solvents, of lacquer clear coatings used on bronze rails, as a daily, volume-weighted average

 3.5 lbs of VOC/gal of coating, excluding water and exempt solvents, for each coating, excluding lacquer clear coatings used on bronze rails.

 Applicable Compliance Method:

 Compliance shall be determined based upon the record keeping requirements specified in Section C.1.

 In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC contents of the 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.
 VOC Emission Limitation:

 4.02 TPY of VOC emissions

 Applicable Compliance Method:

 Compliance shall be determined based upon the record keeping requirements specified in C.3.
 2. Compliance with the daily and annual usage limits shall be based upon the record keeping requirements specified in Sections C.1 and C.3, respectively.
- F. Miscellaneous Requirements**
1. None