

Facility ID: 1431153902 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: 1431153902 Emissions Unit ID: P001 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P001 - Solvent wiping operation	OAC rule 3745-31-05(A)(3) (PTI 14-05665)	Organic compound (OC) emissions from the solvent wiping operation shall not exceed 8.2 pounds per hour and 16.0 tons per year. See terms A.2.a., A.2.b., B.1, and B.2.
	OAC rule 3745-21-07(G)(2)	Exempt per term B.2

2. Additional Terms and Conditions

- (a) The organic compound (OC) content of each cleaning material employed in this emissions unit shall not exceed 8.9 pounds of OC per gallon, as applied. The hourly emission limitation outlined in term A.1. are based upon the emissions unit's potential to emit. Therefore, no hourly records are required to demonstrate compliance with this limit. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the usage restriction, the OC content limitation and emission limitations.

B. Operational Restrictions

1. The maximum usage of cleaning materials employed in emissions unit P001 shall not exceed 3600 gallons per year.
2. 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 permittee shall collect and record the following information each month for emissions unit P001:
 - a. The name and identification number of each cleaning material;
 - b. The volume in gallons, of each cleaning material employed;
 - c. The total volume, in gallons, of all of the cleaning materials employed;
 - d. The OC content of each cleaning material employed, in pounds OC per gallon of coating, as applied;
 - e. The OC emissions from the use of cleaning materials, in pounds OC per month [the summation of b. multiplied by d. employed in emissions unit P001].
 - f. A record of each liquid organic material employed in this emissions unit indicating, whether or not the liquid organic material is photochemically reactive as identified in OAC rule 3745-21-01(C)(5).
2. The permit to install for emissions unit P001 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions units' exhaust systems, 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: IPA

TLV (ug/m3): 492,000

Maximum Hourly Emission Rate (lbs/hr): 8.2

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 5,186

MAGLC (ug/m3): 11,703

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 (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 notify the Hamilton County Department of Environmental Services in writing of any monthly record showing that emissions unit P001 employed cleaning materials that exceeded the applicable maximum OC content limits outlined in term and condition A.2.a. A copy of such record shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance(s) occurred.
2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing that emissions unit P001 employed cleaning materials that are photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), and as outlined in term and condition B.2. 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 submit annual reports which summarize the following for this emissions unit:
 - a. The total OC emissions from the cleaning materials employed in this emissions unit for the previous calendar year.
 - b. The total number of gallons of cleaning materials employed in this emissions unit for the previous calendar year.

The reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Compliance with the emission limitations in Sections A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
8.2 lbs OC/hour from the wiping process
 - Applicable Compliance Method:
The hourly emission limitation outlined is based upon the emissions unit's Potential to Emit (PTE), based on a maximum usage of 1.25 gallons Isopropanol per hour times the OC content of 6.56 pounds per gallon. Higher OC content materials are used at much lower hourly quantities, as documented in PTI application 14-05665 received on January 3, 2005. Therefore, no hourly records are required to demonstrate compliance with this limit.
 - b. Emissions Limitation:

16.0 TPY OC from the wiping process

Applicable Compliance Method:

Compliance with the annual OC emissions limitations shall be demonstrated by a summation of the monthly OC emissions as recorded in C.1. divided by 2000 pounds per ton.

c. Emissions Limitations:

8.9 pounds of OC per gallon of cleaning material, as applied

Applicable Compliance Method:

Formulation data or USEPA method 24 (for coatings) shall be used to determine the OC contents of the organic materials and used to determine if a material is photochemically reactive.

2. Compliance with the usage limitations in Sections B.1 and B.2 of these terms and conditions shall be determined in accordance with the following methods:

a. Usage Limitation:

3600 gallons of coatings/materials per year

Applicable Compliance Method:

Compliance with the usage limitation in term B.1. shall be demonstrated by the record keeping in term C.1.

b. Usage Limitation:

Photochemically reactive materials prohibited

Applicable Compliance Method:

Compliance with the operational restriction in term B.2. shall be demonstrated by the record keeping in term C.1.

F. **Miscellaneous Requirements**

1. None