

Facility ID: 1431224051 Issuance type: Final State Permit To Operate

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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: 1431224051 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>
K002- paint spray booth for miscellaneous metal parts	OAC rule 3745-31-05(A)(3) (PTI 14-05698)	Organic Compound (OC) emissions shall not exceed 15.0 pounds OC/day, excluding cleanup materials. Organic Compound (OC) emissions shall not exceed 4.92 tons OC/yr, including cleanup materials. See terms and conditions B.1 - B.5.
	OAC rule 3745-21-09(U)(2)(e)(ii)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e)(ii) and OAC rule 3745-31-05(C). Organic Compound (OC) emission exemption, based on maximum daily coating usage not exceeding 3 gallons of coating in any one day.
	OAC rule 3745-31-05(C)	See term A.2.b

2. Additional Terms and Conditions

- (a) Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by coating and cleanup material usage and OC content limits and compliance with specified emission limits.
The total allowable usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance with the rolling, 12-month summation limit.

B. Operational Restrictions

1. The maximum OC content of each coating employed in this emissions unit shall not exceed 5.0 pounds of OC per gallon, as applied.
2. The maximum daily coating usage shall not exceed 3 gallons of coating in any one day.
3. The maximum annual coating usage in this emissions unit shall not exceed 1095 gallons.
4. The maximum OC content of each cleanup material employed in this emissions unit shall not exceed 6.6 pounds of OC per gallon, as applied.
5. The maximum annual cleanup material usage in this emissions unit shall not exceed 660 gallons.

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 of coating, as applied;
 - f. The OC content of each cleanup material employed, in pounds OC per gallon;
 - g. The OC emissions from the application of coatings, in pounds OC per day [the summation of b. multiplied by e. for the coating(s) employed in K002.]; and
 - h. The OC emissions from the application of coatings and cleanup materials, in pounds OC per day [the summation of b. multiplied by e. for the coating(s) and d. multiplied by f. for the cleanup material(s) employed in K002.].
2. The permittee shall maintain annual records of the volume, in gallons, of all coatings (including water and exempt solvents) and cleanup materials employed in this emissions unit by summarizing the daily coating usage records and cleanup material usage records at the end of each calendar year.
 3. The permittee shall maintain annual records of the total OC emissions, in tons (summation of the emissions from term C.1.h at the end of each calendar year divided by 2000 pounds per ton.)
 4. The permittee shall collect and record the following information each month for the entire facility:
 - a. The name and identification number of each coating, employed;
 - b. The individual Hazardous Air Pollutant (HAP) content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
 - c. The total combined HAP content of each coating in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (b)];
 - d. The number of gallons of each coating employed;
 - e. The name and identification of each cleanup material employed;
 - f. The individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;
 - g. The total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied [sum all the individual HAP contents from (f)];
 - h. The number of gallons of each cleanup material employed;
 - i. The total individual HAP usage for each HAP from all coatings and cleanup materials employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each coating plus the sum of (f) times (h) for each cleanup material];
 - j. The total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material];
 - k. The updated rolling, 12-month summation of usage for each individual HAP emissions**, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and
 - l. The updated rolling, 12-month summation of usage for total combined HAP emissions**, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
- * A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a individual emissions unit basis.

** This assumes the HAP(s) emitted are the same as the amounts of HAP(s) used since all HAP(s) used evaporated.

5. The permit to install for this emissions unit K002 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: Acetone

TLV (ug/m3): 1,187,116

Maximum Hourly Emission Rate (lbs/hr): 0.497

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 114

MAGLC (ug/m3): 28,264

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 notify the Hamilton County Department of Environmental Services in writing of any daily record showing that emissions unit K002 employed coatings and/or cleanup materials that exceeded the applicable maximum coating usage or maximum OC content limits outlined in terms and conditions B.1. through B.5. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.
2. The permittee shall submit annual reports which specify the annual coating and cleanup material usage and the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
3. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month HAPs emissions limitations in term and condition A.2.b. If no deviations occurred during the reporting period, the permittee shall state so in the report.
4. All quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General terms and conditions of this permit.

E. Testing Requirements

1. Compliance with the emission limitations and OC content limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:
Emission Limitation:

Organic Compound (OC) emissions shall not exceed 15.0 pounds OC/day, excluding cleanup materials.

Applicable Compliance Method:

Compliance with the daily emission limitation shall be demonstrated by multiplying the actual OC content limit for coatings by the actual coating application rate, as required in term and condition C.1.g.
Emission Limitations:

Organic Compound (OC) emissions shall not exceed 4.92 tons OC/yr, including cleanup materials.

Applicable Compliance Method:

Compliance with the above emissions limitation may be demonstrated by the record keeping requirements as specified in term and condition C.3.
Emission Limitation:

5.0 pounds of OC per gallon coating, as applied; and
6.6 pounds of OC per gallon for cleanup materials.

Applicable Compliance Method:

Formulation data or USEPA method 24 (for coatings) shall be used to determine the OC contents of the organic materials.
2. Compliance with the coating and cleanup material usage limitations in terms and conditions B.2., B.3., and B.5. shall be determined by the record keeping requirements as specified in term and condition C.1. and C.2.
3. Compliance with the HAP emissions limitation in term A.2.b shall be demonstrated by the record keeping in term C.4.

F. **Miscellaneous Requirements**

1. None