

Facility ID: 1431383478 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: 1431383478 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>
paint spray booth for metal, wood and vinyl furniture	OAC rule 3745-31-05(A)(3) (PTI 14-04967)	14.5 lbs of organic compound (OC) emissions/day and 2.64 tons per year (TPY) of OC emissions from coatings for metal parts
		5.71 lbs of OC emissions/day and 1.0 TPY of OC emissions from cleanup materials
		on any day when employing either photochemically reactive materials or nonphotochemically reactive materials, 8 lbs/hr and 40 lbs/day of OC emissions from coatings for non-metal parts 7.3 TPY of OC emissions from coatings for non-metal parts
	OAC rule 3745-21-07(G)(2)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2). The emission limitations specified by this rule are equal to or less stringent than those established by OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-09(I)(3)	Exempt, see Section A.2.d below.

2. **Additional Terms and Conditions**
  - (a) The OC content, as applied, of each coating employed for coating metal parts shall not exceed 5.56 pounds of OC per gallon of coating, including water and exempt solvents.  
The OC content, as applied, of each coating employed for coating non-metal parts shall not exceed 6.0 pounds of OC per gallon of coating, including water and exempt solvent.  
The OC content of each cleanup material employed shall not exceed 5.71 pounds of OC per gallon.  
The VOC emission rate for coating of metal furniture is less than 15 pounds of VOC emissions per day.

**B. Operational Restrictions**

1. When coating non-metal parts, the maximum coating usage shall not exceed 6.6 gallons per day and 2,409 gallons per year.
2. When coating metal parts, the maximum coating usage shall not exceed 2.6 gallons per day and 949 gallons per year.
3. The maximum cleanup material usage shall not exceed 1 gallon per day and 365 gallons per year.

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

1. The permittee shall collect and record the following information each day when coating non-metal parts:
  - a. the company identification for each coating employed;
  - b. the total volume, in gallons, of each coating employed;
  - c. the total volume, in gallons, of all coatings employed;

- d. the OC content of each coating, in pounds per gallon, as applied, including water and exempt solvents;
  - e. the total OC emission rate for all coatings, in pounds per day [summation of (b x d) for each coating employed];
  - f. the total number of hours the emissions unit was in operation; and
  - g. the average hourly OC emission rate for all coatings employed to paint non-metal parts (e/f), in pounds per hour (average).
2. The permittee shall collect and record the following information each day when coating metal parts:
- a. the company identification for each coating employed;
  - b. the total volume, in gallons, of each coating employed;
  - c. the total volume, in gallons, of all coatings employed;
  - d. the OC content of each coating, in pounds per gallon, as applied, including water and exempt solvents; and
  - e. the total OC emission rate for all coatings employed, in pounds per day [summation of (b x d) for each coating employed].
3. The permittee shall collect and record the following information each day for all cleanup materials employed:
- a. the company identification for each organic cleanup material employed;
  - b. the total volume, in gallons, of each cleanup material employed;
  - c. the total volume, in gallons, of all cleanup materials employed;
  - d. the OC content of each cleanup material, in pounds per gallon, as applied; and
  - e. the total OC emission rate for all cleanup materials employed, in pounds per day [summation of (b x d) for each cleanup material employed].
4. The permit to install for this emissions unit 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. Ohio EPA's "Review of New Sources of Air Toxic 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: Toluene  
 TLV (ug/m3): 188,000  
 Maximum Hourly Emission Rate (lbs/hr): 5.48  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 608  
 MAGLC (ug/m3): 4,476
- Physical changes to or changes 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" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxics Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxics 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 Toxics Policy" will be satisfied for the above changes, Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], 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 Toxics 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 Toxics 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 Toxics 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 the coating line employs more than the maximum allowable daily coating or cleanup material usage limitation as specified in Section B or the use of any noncomplying coating or cleanup material (i.e., for OC content). 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 submit quarterly deviation (excursion) reports that identify the following:
  - a. an identification of each day during which non-metal parts were coated and the average hourly OC emissions from the coatings exceeded 8 pounds per hour, and the actual average OC emissions for each such day;
  - b. an identification of each day during which non-metal parts were coated and the OC emissions from the coatings exceeded 40 pounds per day, and the actual OC emissions for each such day;
  - c. an identification of each day during which the average OC emissions from the organic cleanup material exceeded 5.71 pounds per day, and the average OC emissions for each such day; and
  - d. an identification of each day during which metal parts were coated and the OC emissions from the coatings exceeded 14.5 pounds per day, and the actual OC emissions for each such day.

All quarterly deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
3. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services that summarize the following:
  - a. the total number of gallons of coatings employed for metal and non-metal parts in this emissions unit for the previous calendar year; and
  - b. the total number of gallons of cleanup materials employed in this emissions unit for the previous calendar year.

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

**E. Testing Requirements**

1. Compliance with the OC content limitations, OC emission limitations and material usage restrictions shall be determined by the following methods:
  - a. OC Content Limitations: 6.0 lbs of OC emissions/gallon for each coating of non-metal parts; 5.56 lbs of OC emissions/gallon for each coating of metal parts; 5.71 lbs of OC emissions/gallon for each cleanup material
 

Applicable Compliance Method: Compliance with the OC content limitations for each coating of non-metal and metal parts and for cleanup materials shall be based upon the record keeping requirements specified in Sections C.1 through C.3. Formulation data or U.S. EPA Method 24 shall be used to determine the OC content of any coating or cleanup material.
  - b. OC Emission Limitations: 8 lbs of OC emissions/hour, 40 lbs of OC emissions/day and 7.3 TPY of OC emissions from coating non-metal parts
 

Applicable Compliance Method: Compliance with the hourly and daily OC emission limitations shall be determined by the record keeping specified in Section C.1. Compliance with the annual OC emission limitation is ensured if compliance is maintained with the daily OC emission limitation.
  - c. OC Emission Limitations: 14.5 lbs of OC/day and 2.64 TPY of OC emissions/year from coatings for metal parts; 5.71 lbs of OC emissions/day and 1.0 TPY of OC emissions from cleanup material
 

Applicable Compliance Method: Compliance with the daily OC emission rate for coating of metal parts and from cleanup materials shall be determined by the record keeping specified in Sections C.2 and C.3, respectively. Compliance with the annual OC emission rate for coating of metal parts is ensured if compliance is maintained with the OC content limitation (6.0 lb of OC/gallon) and the annual material usage restriction (2,409 gallons/year). Compliance with the annual OC emission rate for cleanup materials is ensured if compliance is maintained with the OC content limitation (5.71 lb of OC/gallon) and the annual material usage restriction (365 gallons/year).
  - d. Material Usage Restrictions: 6.6 gallons/day and 2,409 gallons/year for coating of non-metal parts; 2.6 gallons/day and 949 gallons/year for coating of metal parts; 1 gallon/day and 365 gallons/year for cleanup materials
 

Applicable Compliance Method: Compliance with the daily and annual material usage restrictions shall be determined by the record keeping specified in Sections C.1, C.2 and C.3. Compliance with the annual material usage restrictions are ensured if compliance is maintained with the daily material usage restrictions.

**F. Miscellaneous Requirements**

1. None