

Facility ID: 1431400564 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: 1431400564 Emissions Unit ID: P029 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>
4,000-gallon liquid cleaning compound mixing kettle, equipped with a atmospheric damper and lid system	OAC rule 3745-31-05(A)(3) (PTI 14-812)	2.31 lbs of particulate emissions (PE)/batch
		149 lbs of organic compound (OC) emissions/batch
		21.2 lbs/hour of OC emissions averaged over 1 batch
		See Sections A.2.a, A.2.b, and B.2 through B.6 below.
		Compliance with this rule also includes compliance with OAC rules 3745-17-07(A) and 3745-21-07(G). See Section B.1 below.
	OAC rule 3745-21-07(G)(2)	The PE emission limitation specified by this rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11(B)	Visible PE from any stack shall not exceed 20% opacity, as a 6-minute average, except as specified by rule.
	OAC rule 3745-17-07(A)(1)	

2. Additional Terms and Conditions

- (a) Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by employing an atmospheric damper and lid system with an overall estimated control efficiency of 71.8%, for OC emissions and compliance with the specified emissions limitations.
The OC and PE limitations specified above are based upon the emissions unit's potentials to emit, with the OC emissions being controlled by the employment of an atmospheric damper and lid system. Therefore no additional monitoring, record keeping or reporting is necessary to demonstrate compliance with these emission limitations.

B. Operational Restrictions

1. The use of any photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), is prohibited in this emissions unit.
2. Production in this emissions unit shall not exceed 2 batches in any one day and shall not exceed 371 batches in any one year.
3. The exhaust fan associated with this emissions unit shall not operate for more than 16 hours in any one day.
4. An atmospheric damper shall be maintained in the exhaust ducting so as to provide a supply of clean room air to the exhaust fan during product mixing, while the mixing kettle is covered.
5. The lid system on the mixing kettle shall remain closed during mixing, except when filling or charging the mixing kettle, when inspecting the product, or when sampling for quality control.
6. This emissions unit shall not be heated to a temperature exceeding 250 degrees Fahrenheit, when mixing products that contain liquid organic materials.

C. Monitoring and/or Record Keeping Requirements

1. The permittee maintain daily records of the following information for this emissions unit:
 - a. the company identification of each liquid organic material employed in this emissions unit;
 - b. 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);
 - c. the number of batches produced;
 - d. the number of hours the exhaust fan was in operation; and
 - e. the temperature of the emissions unit during mixing, in degrees Fahrenheit.
2. The permittee shall maintain monthly records that specify the total number of batches produced in this emissions unit (summation of C.1.c for each day of the calendar month);
3. The permittee shall maintain annual records that specify the total number of batches produced in this emissions unit for the calendar year (summation of C.2 for each month of the calendar year).

D. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive material (as defined in OAC rule 3745-21-01 (C)(5)) was employed in this emissions unit. The report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of material(s) emitted each such day. This report shall be submitted to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.
2. The permittee shall submit quarterly deviation reports to the Hamilton County Department of Environmental Services that specify the following information:
 - a. all exceedances of the 2 batches/day daily production restriction;
 - b. all exceedances of the operational temperature restriction of 250 degrees Fahrenheit; and
 - c. all exceedances of the 16 hours/day exhaust fan operational restriction.
3. The quarterly deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
4. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services that specify the total number of batches produced for the calendar year in this emissions unit. The report shall be submitted by January 31 of each year and cover the previous calendar year.

E. Testing Requirements

1. Compliance with the emission limitations and operational restrictions specified in Sections A.1 and B shall be determined by the following methods:
Emission Limitation: 2.31 lbs of PE/batch

Applicable Compliance Method: The PE limitation is based upon the emissions unit's potential to emit and was established by the following methodology:

$$(0.0404 \text{ lb}/100 \text{ lbs of powder}) \times (0.23) \times (1,556 \text{ lbs}/\text{hour}) \times (16 \text{ hours}/\text{batch}) = 2.31 \text{ lbs of PE}/\text{batch}$$

where:

PE from the mixing kettle = 0.0404 lb/100 lbs of powder (worst case emission factor as supplied by the facility);
Maximum Powder Usage = 23% of the batch (information as supplied by the facility);
Maximum Production Rate = 1,556 lbs/hour; and
Maximum amount of time for each batch = 16 hours.

If required, the permittee shall demonstrate compliance with the PE limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-5. The hourly PE rate shall then be multiplied by the duration (in hours) of the batch in order to determine the lbs of PE/batch.
Emission Limitation: 149 lbs of OC emissions/batch

Applicable Compliance Method: The OC emission limitation is based upon the emissions unit's potential to emit, in conjunction with the employment of an atmospheric damper and lid system, and was established by the following methodology:

$$(1 - 0.718) \times (527.34 \text{ lbs of uncontrolled OC emissions}/\text{batch}) = 149 \text{ lbs of controlled OC emissions}/\text{batch}$$

where:

Worst Case Batch Emissions = 527.34 lbs of uncontrolled OC emissions/batch (emission factor supplied by facility from 6/27/85 emission tests); and

Atmospheric damper and lid system overall control efficiency = 71.8% (control efficiency estimate as provided by the facility)
Emission Limitation: 21.2 lbs of OC emissions/hour averaged over 1 batch

Applicable Compliance Method: The OC emission limitation is based upon the emissions unit's potential to emit, in conjunction with the employment of an atmospheric damper and lid system, and was established by the following methodology:

$(1 - 0.718) \times (75.33 \text{ lbs/hour}) = 21.2 \text{ lbs of OC emissions/hour averaged over 1 batch}$

where:

The average uncontrolled OC emissions = 75.33 lbs of OC emissions/hour (emission factor supplied by facility from 6/27/85 emission tests); and

Atmospheric damper and lid system overall control efficiency = 71.8% (control efficiency estimate as provided by the facility)

If required, the permittee shall demonstrate compliance with the hourly OC emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4, and 18, 25 or 25A, as appropriate.

Emission Limitation: Visible PE from any stack shall not exceed 20% opacity, as a 6-minute average, except as specified by rule.

Applicable Compliance Method: If required, compliance with the visible PE limitation shall be determined using the method specified in OAC rule 3745-17-03(B)(1).

Batch Production Restrictions: Production in this emissions unit shall not exceed 2 batches in any one day and shall not exceed 371 batches in any one year.

Applicable Compliance Method: Compliance with the daily batch production restriction shall be determined by the record keeping requirements specified in Section C.1.c.

Compliance with the annual batch production restriction shall be determined by the record keeping requirements specified in Section C.3.

Exhaust Fan Operation Restriction: The exhaust fan associated with this emissions unit shall not operate for more than 16 hours in any one day.

Applicable Compliance Method: Compliance with the exhaust fan operational restriction shall be determined by the record keeping requirements specified in Section C.1.d.

Temperature Restriction: This emissions unit shall not be heated to a temperature exceeding 250 degrees Fahrenheit, when mixing products that contain liquid organic materials.

Applicable Compliance Method: Compliance with the temperature restriction shall be determined by the record keeping requirements specified in Section C.1.e.

F. Miscellaneous Requirements

1. None