Facility ID: 1431404212 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: 1431404212 Emissions Unit ID: K001 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
(K001) - Paint touch-up booth for miscellaneous metal parts coating.	OAC rule 3745-31-05(A)(3) (14-05856)	Volatile Organic Compound (VOC) emissions shall not exceed 0.88 pound per hour from coating usage only. VOC emissions shall not exceed 4.62 lbs/day from cleanup material usage. VOC emissions shall not exceed 2.59 TPY. See terms and conditions A.2.b, A.2.c, B.1 and B.2. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1)(d).
	OAC rule 3745-21-09(U)(1)(d)	See term and condition 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 restrictions, the VOC content limitations and emission limitations.
   The VOC content of each coating, as applied, shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents.
   The VOC content of each cleanup material shall not exceed 7.0 pounds of VOC per gallon of cleanup material.
   The hourly emission limitation specified in term A.1 is based upon the emissions unit's potential to emit. Therefore, no hourly records are required to demonstrate compliance with this limitation.

B. **Operational Restrictions**

1. The maximum annual coating usage for emissions unit K001 shall not exceed 1002 gallons per year as applied, excluding water and exempt solvents.

2. The maximum daily cleanup material usage in emissions unit K001 shall not exceed 0.66 gallon per day. The maximum annual cleanup material usage in emissions unit K001 shall not exceed 240 gallons per year.

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

1. The permittee shall collect and record the following information each day for emission unit K001:

   a. the name and identification number of each coating and cleanup material;

   b. the volume in gallons, as applied, of each coating employed, excluding water and exempt solvents;

   c. the total volume, in gallons, of all of the coatings employed, excluding water and exempt solvents;

   d. the volume in gallons of each cleanup material employed;

   e. the VOC content of each coating employed, in pounds VOC per gallon of coating, as applied, excluding water and exempt solvents;

f. the VOC content of each cleanup material employed, in pounds VOC per gallon;

g. the VOC emissions from the application of coatings and cleanup materials, in pounds VOC 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 K001];

h. The total daily VOC emission rate (g) shall be summed at the end of each month to obtain the monthly VOC emission rate; and

i. the VOC emissions from the application of cleanup materials, in pounds VOC per day [d multiplied by f for the cleanup material(s) employed in K001].

2. The permittee shall maintain annual records of the volume, in gallons, of all coatings (excluding water and exempt solvents) and cleanup materials employed in this emissions unit by summarizing the 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 VOC 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 permit to install for this emissions unit 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: 2-Butoxy ethanol

TLV (mg/m3): 96.6

Maximum Hourly Emission Rate (lb/hr): 0.88

Predicted 1-Hour Maximum Ground Level Concentration (ug/m3): 287

MAGLC (ug/m3): 2301

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:
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 minimus 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.

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.).

D. **Reporting Requirements**

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of noncomplying coatings or cleanup materials (i.e., VOC contents). 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 notify the Hamilton County Department of Environmental Services of any daily record showing that emissions unit K001 employed more than the applicable maximum daily cleanup material usage limit

outlined in term and condition B.2. A copy of such record shall be sent to the Hamilton County Department of Environmental Services within 30 days after the exceedance occurred. For each usage limit exceedance the permittee shall also identify if an exceedance of the applicable daily VOC emissions limit occurred.

3. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services which specify the total VOC emissions from emissions unit K001 for the previous calendar year. This report shall also specify the total volume, in gallons, of coatings, excluding water and exempt solvents employed in emissions unit K001 and the total volume, in gallons, of cleanup materials employed in emissions unit K001 for the previous calendar year. These reports shall be submitted by January 31 of each year.

4. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. **Testing Requirements**

1. Compliance with the emission limitations in Section A. of these terms and conditions shall be determined in accordance with the following method(s):

Emission Limitation:

Volatile Organic Compound (VOC) emissions shall not exceed 0.88 pound of VOC per hour from coating usage only.

Applicable Compliance Method:

Compliance with the hourly VOC emission limitation shall be demonstrated by multiplying the maximum hourly coating usage of 0.25 gallon of coating per hour, excluding water and exempt solvents, by the coating VOC content of 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents.
Emission Limitation:

VOC emissions shall not exceed 4.62 lbs/day from cleanup material usage.

Applicable Compliance Method:

Compliance with daily cleanup material VOC emission limitation shall be determined by multiplying maximum daily cleanup material usage of 0.66 gallon of cleanup material per day by the VOC content limit of 7.0 pounds of VOC per gallon of cleanup material.
Emission Limitation:

VOC emissions shall not exceed 2.59 TPY.

Applicable Compliance Method:

Compliance with the annual VOC emission limitation shall be demonstrated by a summation of the monthly VOC emissions as recorded in term and condition C.1.h for both coatings and cleanup materials. This summation divided by 2000 pounds equals tons per year (TPY) VOC emissions.
Emission Limitations:

3.5 pounds of VOC per gallon of coating, as applied, excluding water and exempt solvents, and
7.0 pounds of VOC per gallon of cleanup material.

Applicable Compliance Method:

USEPA methods 24 and 24A shall be used to determine the VOC content for coatings and cleanup materials, respectively. If, pursuant to 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or cleanup material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

2. Compliance with the usage limitations specified in terms and conditions B.1 and B.2 shall be demonstrated by the record keeping in terms and conditions C.1 and C.2.

F. **Miscellaneous Requirements**

1. None