Facility ID: 1431423649 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: 1431423649 Emissions Unit ID: K004 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K004-Spray Paint Booth No. 1	OAC rule 3745-31-05(A)(3) (PTI 14-05107)	Volatile organic compound (VOC) emissions shall not exceed 21.36 pounds per day, excluding cleanup. Volatile organic compound (VOC) emissions shall not exceed 3.94 tons per year (TPY), including cleanup. See terms A.2.a, B.1, and B.2.
	OAC rule 3745-21-09(U)(1)	Exempt as per OAC rule 3745-21-09(U)(2)(c).

2. **Additional Terms and Conditions**

   (a) The volatile organic compound (VOC) content of each coating and cleanup material employed in this emissions unit shall not exceed 7.1 pounds of VOC per gallon of coating, as applied.
   The daily and annual emission limitations outlined are based upon the emissions unit's Potential to Emit (PTE). Therefore, no daily records are required to demonstrate compliance with these limits.
   Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by coating and cleanup material usage restrictions, the VOC content limitations and emissions limitations.

B. **Operational Restrictions**

1. The maximum annual coating usage for this emissions unit shall not exceed 1095 gallons.

2. The maximum annual cleanup material usage for this emissions unit shall not exceed 10 gallons.

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

1. The permittee shall collect and record the following information each month:

   a. The name and identification number of each coating and cleanup material employed.

   b. The volume, in gallons, of each coating and cleanup material employed.

   c. The total volume, in gallons, of all coatings and cleanup materials employed.

   d. The VOC content of each coating and cleanup material, in pounds per gallon, as applied.

   e. The total VOC emission rate for all coatings and cleanup materials employed, in pounds per month (b x d).

2. The permit to install for this emissions unit (K004) 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: toluene

TLV (ug/m3): 188,000

Maximum Hourly Emission Rate (lbs/hr): 2.67

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 45.62

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 Toxic 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 applying the "Air Toxic 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 or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");

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) meet(s) the definition of a "modification" under other provisions of the rule, 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 still 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 the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where 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 record showing the use of noncomplying coatings and/or cleanup materials (i.e., for VOC contents) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days following the end of the calendar month.

2. The permittee shall submit annual reports which summarize the following for this emissions unit:

a. The total VOC emissions from coatings and cleanup materials employed in this emissions unit for the previous calendar year;

b. The total number of gallons of coatings employed in this emissions unit for the previous calendar year; and

c. The total number of gallons of cleanup materials employed in this emissions unit for the previous calendar year.

The reports shall be submitted to the Hamilton County Department of Environmental Services by January 31 of each year.

E. **Testing Requirements**

1. USEPA methods 24 and 24A shall be used to determine the VOC content for (a) coatings and (b) flexographic and rotogravure printing lines and related coatings, 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 ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

2. Emission Limitations

21.36 lbs/day VOC, excluding cleanup
3.94 TPY VOC, including cleanup

Applicable Compliance Methods

The daily limit is determined by multiplying the maximum VOC content limitation for coatings in term A.2.a, 7.1 lbs/gal, by the maximum coating application rate of 3.0 gal/day. The annual emissions from the coatings is determined by multiplying the maximum VOC content limitation for coatings and cleanup materials in term A.2.a, 7.1 lbs/gal, by the maximum annual coating and cleanup material usage of 1105 gallons.

3. Compliance with the emission limitations, VOC content limitation and usage limitations shall be demonstrated by the record keeping requirements as specified in term C.1.

F. **Miscellaneous Requirements**

1. None