

Facility ID: 1431484126 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: 1431484126 Emissions Unit ID: P001 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>
P001-Wood Stripping Operation	OAC rule 3745-31-05(A)(3) (PTI 14-05490)	Volatile Organic Compound (VOC) emissions shall not exceed 185.6 lbs/day. See Section A.2.b. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C). VOC emissions shall not exceed 11.86 TPY, based upon a rolling, 12-month summation. See term A.2.c and section B.1.
	OAC rule 3745-31-05(C)	

2. Additional Terms and Conditions

- (a) Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by usage and emission limitations and VOC content limitations.
The VOC content of each stripping material employed in this emissions unit shall not exceed 9.28 lbs/gallon.
The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units K001, P001 other de minimus air contaminant source, as defined in OAC rule 3745-15-05, and other air contaminant sources exempt from the requirement to obtain a permit-to-install pursuant to OAC rule 3745-31-03 installed subsequent to the issuance of this permit, combined, 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 daily 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.

B. Operational Restrictions

1. The maximum annual stripping material usage for this emissions unit shall not exceed 2,555 gallons, based upon a rolling, 12-month summation of the stripping material usage figures.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for this emissions unit:
 - a. The name and identification number of each stripping material employed.
 - b. The number of gallons of each stripping material employed.
 - c. The organic compound content of each stripping material, in pounds per gallon, as applied.
 - d. The total organic compound emission rate for all stripping material employed, in pounds or tons (b x c).
 - e. The updated rolling, 12-month summation of the total stripping material usage, in gallons, as applied. This shall include the information for the current month and the preceding eleven months.
 - f. The rolling, 12-month summation of the VOC emissions, in tons.
2. The permittee shall collect and record the following information each month for the emissions units identified in

term A.2.c:

- a. The name and identification number of each coating and stripping material employed;
- b. The individual Hazardous Air Pollutant (HAP) content for each HAP of each coating and stripping material in pounds of individual HAP per gallon of coating or stripping material, as applied;
- c. The total combined HAP content of each coating and stripping material in pounds of combined HAPs per gallon of coating or stripping material as applied [sum all the individual HAP contents from (b)];
- d. The number of gallons of each coating and stripping material 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 emissions for each HAP from all coatings, stripping materials, and cleanup materials employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each coating and stripping material plus the sum of (f) times (h) for each cleanup material];
- j. The total combined HAP emissions from all coatings, stripping materials and cleanup materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating and stripping material plus the sum of (g) times (h) for each cleanup material];
- k. The updated rolling, 12-month summation 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 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.

3. The permit to install for this emissions units P001 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: Methylene Chloride
 TLV (ug/m3): 173,700
 Maximum Hourly Emission Rate (lbs/hr): 7.2
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1386
 MAGLC (ug/m3): 4136

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:

4.
 - 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 with the above changes, the 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 Toxic Policy:"

- a. A description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. Documentation of it's 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 Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying stripping materials (i.e., for OC contents). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days following the end of the calendar month.
2. 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 stripping material usage limitation. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
3. The permittee shall also submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
4. The permittee shall submit quarterly deviation reports which identify any exceedance of the HAP emission limitations set forth in term A.2.c.

The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous three calendar months (October through December, January through March, April through June and July through September, respectively).

If no exceedances occurred, the permittee shall state so in the report.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
Volatile Organic Compound (VOC) emissions shall not exceed 185.6 lbs/day.

Applicable Compliance Method:
Compliance has been demonstrated by multiplying the maximum daily stripping material usage rate of 20 gallons/day by the maximum VOC content of 9.28 lbs/gallon
 - b. Emission Limitation:
VOC emissions shall not exceed 11.86 TPY, based upon a rolling, 12-month summation.

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements as specified in Section C.1.
 - c. Emission Limitation:
The VOC content of each stripping material employed in this emissions unit shall not exceed 9.28 lbs/gallon.

Applicable Compliance Method:
OAC rule 3745-21-10(B) shall be used to determine the VOC contents of the stripping materials employed in this emissions unit. 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 stripping material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for the coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

Method 24 or 24A can be performed by the permittee or other party (i.e., the permittee's stripping supplier).
 - d. Emission Limitation:
The maximum annual stripping material usage for this emissions unit shall not exceed 2,555 gallons, based upon a rolling, 12-month summation of the stripping material usage figures.

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements as specified in Section C.1.
2. Compliance with the HAP emission limitations will be determined by the record keeping requirements specified in Section C.2.

F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A, B, C.1, C.2, D and E.