

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: 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>
K001-wood parts paint spray booth	OAC rule 3745-31-05(A)(3) (PTI 14-05357)	Volatile Organic Compound (VOC) emissions shall not exceed 120.96 pounds per day, for coatings only. Volatile Organic Compound (VOC) emissions shall not exceed 8.7 TPY, for coatings and cleanup.
		See A.2.b, A.2.c, B.1 and B.2
	OAC rule 3745-31-05(C)	See term A.2.e.
	OAC rule 3745-17-11(C)	See term A.2.f. See sections C.4, C.5, C.6.

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 coating employed in this emissions unit shall not exceed 6.3 lbs/gallon, as applied.
 - The VOC content of each cleanup material employed in this emissions unit shall not exceed 6.6 lbs/gallon.
 - The daily emission limitation outlined above is based upon the emissions unit's potential to emit (the maximum hourly emission rate multiplied by 24 hours/day). Therefore, no daily records are required to demonstrate compliance with this limit.
 - 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 permittee shall operate the dry particulate filter system for the coating operations in accordance with the manufacturer's recommendations, instructions, and/or operating manual, with any modifications deemed necessary by the permittee. The dry filtration system shall be employed during all periods of coating application to control particulate emissions.

B. Operational Restrictions

1. The maximum annual coating material usage shall not exceed 1,610 gallons.
2. The maximum annual cleanup material usage shall not exceed 1,100 gallons for cleanup materials.

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 coating employed.
 - b. The OC content of each coating, in pounds per gallon, as applied.
 - c. The name and identification number of each cleanup material employed.

- d. The OC content of each cleanup material, in pounds per gallon.
- e. The number of gallons of each coating employed.
 - f. The number of gallons of each cleanup material employed.
 - g. The total OC emissions from all coatings and cleanup materials employed, in pounds or tons [(b x e) + (d x f)].
2. The permittee shall collect and record the following information each month for the emissions units identified in term A.2.e:
- 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 unit K001 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): 8.21
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 989.9
 MAGLC (ug/m3): 4,486

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:

- 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.
4. The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry filtration system with any modifications deemed necessary by the permittee during the time period in which the dry filtration system is utilized. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
 5. The permittee shall conduct periodic inspections of the dry filtration system to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee. The periodic inspections of the dry filtration system shall be performed at a frequency that is based upon the recommendation of the manufacturer, and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency. In addition to these periodic inspections, the permittee shall conduct a comprehensive inspection of the dry filtration system, not less than once each calendar year, while the emissions unit is shut down; and shall perform any needed maintenance and repair for the control device to ensure that it is operated in accordance with the manufacturer's recommendations.

The permittee shall document each inspection of the dry filtration system by maintaining a record that includes the date of the inspection, a description of each problem identified and the date it was corrected, a description of the maintenance and repairs performed, and the name of the person who performed the inspection. These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

6. In the event that the dry filtration system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee, the dry filtration system shall be expeditiously repaired or otherwise returned to operation in accordance with such requirements. The permittee shall maintain a record of those periods when the dry filtration system is not operating in accordance with such requirements. These records shall be maintained at the facility for not less than five years from the date of completion and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

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 and/or cleanup materials (i.e., for OC contents). 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 identify any exceedances of the annual coating or cleanup material usage limitations, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year.
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 120.96 pounds per day, for coatings only.

Applicable Compliance Method:
Compliance has been demonstrated by multiplying the maximum hourly coating usage rate of 0.80 gal/hr by the maximum operating schedule of 24 hours/day and by the maximum OC content of 6.3 lbs/gallon.
 - b. Emission Limitation:
Volatile Organic Compound (VOC) emissions shall not exceed 8.7 TPY, for coatings and cleanup.

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements as specified in Section C.1., and shall be the sum of the monthly VOC emission rates for the calendar year.

c. Emission Limitation:

VOC contents for coatings and cleanup material shall not exceed 6.3 pounds VOC per gallon of coating and 6.6 pounds VOC per gallon of cleanup material

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section C.1. OAC rule 3745-21-10(B) shall be used to determine the VOC contents of the coatings and cleanup 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 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 coating supplier).

d. Usage Limitation:

Material usage shall not exceed 1,610 gallons/year coatings and 1,100 gallons/year cleanup materials.

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 are federally enforceable: A.2.e, C.2 and D.4.