

Facility ID: 1483000394 Issuance type: Final State Permit To Operate

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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: 1483000394 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 - Custom made miscellaneous metal parts, wood, and fiberglass parts paint spray booth (Bench Booth); pre-coating parts cleaning operation; brushed coatings; gun cleanup	OAC rule 3745-31-05(A)(3) PTI 14-05601	Organic compound (OC) emissions shall not exceed 8 lbs/hr when applying coatings identified as Photochemically Reactive Materials coatings to non-metal parts, including emissions from cleaning materials identified as Photochemically Reactive Materials. OC emissions shall not exceed 37.7 lbs/day, including emissions from cleaning materials. OC emissions shall not exceed 2.27 tons per year (TPY), including emissions from cleaning materials. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1)(c). See terms and conditions A.2.b., A.2.c., A.2.d., and B.1. through B.4.
	OAC rule 3745-21-07(G)(2)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-09(U)(1)(c)	See term and condition A.2.a.

2. Additional Terms and Conditions

- (a) The VOC/OC content of each coating applied to miscellaneous metal parts or products, as defined by OAC rule 3745-21-01, shall not exceed 3.5 pounds per gallon of coating, excluding water and exempt solvents.
The OC content of each coating applied to non-metal parts shall not exceed 5.01 pounds per gallon of coating.
The OC content of each cleaning solvent used in the pre-coating parts cleaning operation and gun cleanup operation shall not exceed 6.31 pounds per gallon of cleaning solvent.
Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the material usage limits, compliance with the OC and VOC content limits, and compliance with the OC and toluene emissions limits.

B. Operational Restrictions

1. The maximum daily coating usage for emissions unit K001 shall not exceed 5 gallons per day based on a summation of all coatings applied by spray gun and/or brush on miscellaneous metal and/or non-metal parts.
2. The maximum annual coating usage for emissions unit K001 shall not exceed 780 gallons per year based on a summation of all coatings applied by spray gun and/or brush on miscellaneous metal and/or non-metal parts.
3. The maximum daily cleaning solvent usage from the pre-coating parts cleaning operation and gun cleanup operation, combined, for emissions unit K001 shall not exceed 2 gallons per day based on a summation of all cleaning solvents applied.

4. The maximum annual cleaning solvent usage from the pre-coating parts cleaning operation and gun cleanup operation, combined, for emissions unit K001 shall not exceed 100 gallons per year based on a summation of all cleaning solvents applied.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for emissions unit K001:
- the name and identification number of each coating and cleaning solvent;
 - the volume, in gallons, of each coating employed on miscellaneous metal parts and on non-metal parts, as applied;
 - the total volume, in gallons, of all of the coatings employed, as applied;
 - the volume, in gallons, of each cleaning solvent employed, as applied;
 - the total volume in gallons of each cleaning solvent employed, as applied;
 - the VOC content of each coating applied to miscellaneous metal parts, in pounds VOC per gallon of coating, as applied, excluding water and exempt solvents;
 - the OC content of each coating applied to metal and non-metal parts, in pounds OC per gallon of coating, as applied;
 - the OC content of each cleaning solvent used to pre-clean metal and/or non-metal parts and the clean-up of the spray guns, in pounds OC per gallon of cleaning solvent, as applied;
 - the OC emissions from the application of coatings and cleaning solvents, in pounds OC per day [the summation of b. multiplied by g. for the coating(s), and d. multiplied by h. for the cleaning solvents(s) employed in K001];
 - the hours of actual operation of the booth,
 - the hourly OC emission rate for all coatings applied to non-metal parts, in pounds per hour [i. divided by j.].
 - toluene content of the coatings used*,
 - the hourly toluene emission rate for all coatings, in pounds per hour [l. multiplied by b. divided by j.]; and
 - a record of each coating and cleaning material employed in this emissions unit indicating whether or not the material is photochemically reactive as identified in OAC rule 3745-21-01(C)(5).

* see term C.4

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

2. The permittee shall maintain monthly records of the total volume, in gallons, of all coatings and cleaning materials employed in this emissions unit. The monthly usage records shall be summarized in gallons per year at the end of each calendar year.
3. The permittee shall collect and record the following information for each hour when applying coatings and/or cleaning materials identified as Photochemically Reactive Materials (PRMs) on non-metal parts in emissions unit K001:
- the company identification for each coating employed;
 - for each day during which a photochemically reactive material is employed, the volume, in gallons, of each coating, as applied, each hour of the day;
 - the OC content of each coating, in pounds OC per gallon of coating, as applied; and
 - for each hour during which a photochemically reactive material is employed, the total OC emission rate for all coatings, in pounds per hour (b. multiplied by c. for the non-metal PRM coating(s) employed in K001).
- [Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically" are based upon OAC rule 3745-21-01(C)(5)].
4. The permit to install for emissions units K001 and K002 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions units' 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 emissions units K001 and K002 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): 1.75, K001 (3.50, K001 and K002, combined)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 4428 (K001 and K002, combined)

MAGLC (ug/m3): 4476

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 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) 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.

D. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services of any daily record showing that emissions unit K001 employed coatings and/or cleanup materials that exceeded the applicable maximum OC content limits outlined in terms and conditions A.2.b. and A.2.c. A copy of such record shall be sent to the Hamilton County Department of Environmental Services within 30 days after the exceedance(s) occurred. For each OC content limit exceedance the permittee shall also identify if an exceedance of the applicable hourly and daily OC emissions limit occurred.
2. The permittee shall notify the Hamilton County Department of Environmental Services of any daily record showing that emissions unit K001 employed coatings that exceeded the applicable maximum VOC content limits outlined in terms and conditions A.2.a. A copy of such record shall be sent to the Hamilton County Department of Environmental Services within 30 days after the exceedance(s) occurred. For each VOC content limit exceedance the permittee shall also identify if an exceedance of the applicable daily OC emissions limit occurred.
3. 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 coating usage limit and/or cleanup material usage limit outlined in terms and conditions B.1. and B.3. 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 OC emissions limit occurred.
4. The permittee shall notify the Hamilton County Department of Environmental Services of any daily record showing:
 - a. an identification of each hour during which the organic compound emissions from the non-metal parts coatings and cleaning materials when applying photochemically reactive materials exceeded 8 pounds per hour, and the actual organic compound emissions for each such hour; and
 - b. an identification of each day during which the organic compound emissions from the coatings and cleanup materials exceeded 37.7 pounds per day, and the actual organic compound emissions for each such day.

A copy of such record shall be sent to the Hamilton County Department of Environmental Services within 30 days after the exceedance(s) occurred.
5. The permittee shall notify the Hamilton County Department of Environmental Services of any daily record showing that toluene emissions exceeded the allowable maximum toluene emissions limit, as outlined in term and condition A.2.d. A copy of such record, including the actual toluene emissions for each such hour, shall be sent to the Hamilton County Department of Environmental Services within 30 days after the exceedance(s) occurred.
6. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services which specify the total OC emissions from emissions unit K001 for the previous calendar year. This report shall also specify the total volume, in gallons, of coatings employed in emissions unit K001 and the total volume, in gallons, of cleaning materials employed in emissions unit K001 for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Compliance with the emission limitations and OC content limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emissions Limitation

8 lbs OC emissions/hr when applying PRM coatings on non-metal parts

Applicable Compliance Method

Compliance with the hourly OC emissions limitation shall be demonstrated by the record keeping requirement in terms and conditions C.1 and C.3.
 - b. Emissions Limitation

37.7 lbs OC emissions/day, including emissions from cleanup materials

Applicable Compliance Method

Compliance with the daily OC emissions limitation shall be demonstrated by the record keeping requirement in term and condition C.1.
 - c. Emissions Limitation

2.27 tons per year (TPY) OC emissions, including emissions from cleanup materials

Applicable Compliance Method

Compliance with the annual OC emissions limitation shall be demonstrated by a calendar year summation of the actual daily emissions as calculated according to the record keeping requirement in term and condition C.1.
 - d. Emissions Limitation

1.75 pounds toluene emissions per hour

Applicable Compliance Method

Compliance with the hourly toluene emissions limitation shall be demonstrated by the record keeping requirement in term and condition C.1.
 - e. Emissions Limitations

3.5 pounds VOC per gallon of coating, excluding water and exempt solvents of each coating applied to metal parts

Applicable Compliance Method

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

5.01 pounds OC per gallon of coating of each coating applied to non-metal parts

6.31 pounds OC per gallon of cleaning solvent of each cleaning solvent used in the pre-coating parts cleaning operation and gun cleanup operation

Applicable Compliance Method

Formulation data or USEPA method 24 (for coatings) shall be used to determine the OC contents of the coatings.
 2. Compliance with the coating and cleanup usage limitation in terms and conditions B.1. and B.2. shall be determined by the record keeping requirements as specified in terms and conditions C.1. and C.2., respectively.
 3. Compliance with the cleaning solvent usage limitation in terms and conditions B.3. and B.4. shall be determined by the record keeping requirements as specified in terms and conditions C.1. and C.2., respectively.
- F. Miscellaneous Requirements**
1. None