

Facility ID: 1483000438 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: 1483000438 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 - Blowtherm Downdraft paint spray booth for automotive refinishing with HVLP spray guns and curing oven | OAC rule 3745-31-05(A)(3)<br>PTI 14-05373 | Volatile Organic Compound (VOC) emissions shall not exceed 2.03 pounds per hour (excluding emissions from cleanup materials).<br><br>Volatile Organic Compound (VOC) emissions shall not exceed 6.68 TPY (including emissions from cleanup materials).<br><br>See terms A.2.a and A.2.c.<br><br>See sections B.1 and B.2.<br><br>VOC emission exemption. The requirements of OAC rule 3745-21-09(U)(1) shall not apply to the repainting (refinishing) of used motor vehicles and trailers. |
|  | OAC rule 3745-21-09(U)(2)(c)              |   |

**2. Additional Terms and Conditions**

- (a) The volatile organic compound (VOC) content of each coating employed in this emissions unit shall not exceed 6.78 pounds of VOC per gallon of coating, as applied. The volatile organic compound (VOC) content of each cleanup material employed in this emissions unit shall not exceed 7.3 pounds of VOC per gallon of cleanup material, as applied. The hourly emission limitation outlined is based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with this limitation. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of High Volume Low Pressure (HVLP) spray equipment and compliance with the VOC emission limitations, the VOC content and usage limitations.

**B. Operational Restrictions**

1. The maximum annual coating usage shall not exceed 1872 gallons per year, as applied.
2. The maximum amount of cleanup material usage which is not recycled and lost to evaporation shall not exceed 90 gallons per year.

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

1. The permittee shall collect and record the following information each month for emissions unit K001:
  - a. The name and identification number of each coating and cleanup material employed;
  - b. The volume, in gallons, of each coating, as applied and the volume, in gallons, of each cleanup material not recycled;
  - c. The total volume, in gallons, of all coatings, as applied and the volume, in gallons, of all cleanup materials not recycled;
  - d. The VOC content of each coating and cleanup material, in pounds per gallon, as applied; and
  - e. The total VOC emission rate for all coatings and cleanup materials, in pounds per month (b x d).

The monthly VOC emissions shall be summarized annually to demonstrate compliance with the annual VOC emission limitation.

2. 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: Methyl isobutyl ketone (MIBK)

TLV (ug/m3): 204,800

Maximum Hourly Emission Rate (lbs/hr): 0.54

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 435

MAGLC (ug/m3): 4876

The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(d), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. 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.).

The permittee shall submit annual reports that describe any changes to this emissions unit which affect the air toxic modeling. If no changes were made during the year, then a report shall be submitted stating that no changes were made. This report is due by January 31 of each year and shall cover the previous calendar year.

#### 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 that exceedance occurred.
2. The permittee shall submit annual exceedance 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. If no exceedances occurred during the reporting period then a report is required stating so. These reports shall be submitted by January 31 of each year.

#### E. Testing Requirements

1. Emission Limitations:
 

Volatile Organic Compound (VOC) emissions shall not exceed 2.03 pounds per hour (excluding emissions from cleanup materials).

Volatile Organic Compound (VOC) emissions shall not exceed 6.68 TPY (including emissions from cleanup materials).

Applicable Compliance Method:

  - a. Compliance with the lbs of VOC/hr emissions limitation shall be demonstrated by multiplying the actual coating VOC content, as applied (lbs VOC/gallon coating) by the actual coating usage rate, as applied (gallons coating/hour); and
  - b. Compliance with the TPY VOC emission limitation shall be demonstrated by a 12-month summation of the monthly VOC emission records in term C.1.e.
2. USEPA methods 24 and 24A shall be used to determine the VOC content for coatings and cleanup materials. 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.
3. Compliance with the usage limitations in sections B.1 and B.2 shall be demonstrated by the record keeping in section C.1.

#### F. Miscellaneous Requirements

1. None