

Facility ID: 1483040388 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: 1483040388 Emissions Unit ID: K001 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

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 - Miscellaneous metal parts coating - large crane painting operation	OAC rule 3745-31-02(A) PTI 14-05860	Volatile Organic Compound (VOC) emissions shall not exceed 9.99 tons/year from coating and cleanup materials.
	OAC rule 3745-21-09(U)(1)(c)	See term and condition A.2.a. The VOC content of the coatings employed shall not exceed 3.5 lbs of VOC per gallon of coating, as applied, excluding water and exempt solvents.

2. Additional Terms and Conditions

- (a) Permit to install 14-05860 for this air contaminant source takes into account the following voluntary restriction as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):

The Volatile Organic Compound (VOC) emissions shall not exceed 9.99 tons/year from coating and cleanup materials.

B. Operational Restrictions

1. None

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 employed;
 - b. the VOC content of each coating, as applied, excluding water and exempt solvents in pounds of VOC per gallon;
 - c. the number of gallons of each coating, as applied, excluding water and exempt solvents;
 - d. the name and identification number of each cleanup material employed;
 - e. the VOC content of each cleanup material, as applied, in pounds of VOC per gallon;
 - f. the number of gallons of each cleanup material; and
 - g. The total VOC emissions from all coating and cleanup materials employed, in pounds [i.e., the sum of (b) times (c) plus the sum of (e) times (f) for each coating and cleanup material employed].
2. The permittee shall calculate and record the total annual VOC emissions from coatings and cleanup materials, [i.e., the sum of the monthly VOC emission rates from the coating and cleanup materials for the calendar year].
3. The permit to install for this emissions unit [K001] was evaluated based on the actual 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 to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN3 model or

other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN3 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Ethyl benzene
 TLV (ug/m3): 434,192
 Maximum hourly emission rate (lb/hr): 21.87
 Predicted 1-hour maximum ground level concentration (ug/m3): 8254 (at the fence line)
 MAGLC (ug/m3): 10,338

4. 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.).

D. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of each record showing a VOC content greater than 3.5 pounds VOC per gallon, as applied, excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days after the exceedance occurs.
2. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services that specify the annual VOC emissions (including coatings and cleanups) from emissions unit K001 for the calendar year. This report shall be submitted by January 31 of each year and cover the previous calendar year.
3. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services 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.

E. Testing Requirements

1. Compliance with the emission limitations in Section A 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 9.99 tons/year from coating and cleanup materials.

Applicable Compliance Method:
 Compliance shall be based upon the record keeping specified in Section C.2.

b. Emissions Limitation:
 VOC content of 3.5 lbs VOC per gallon coating, as applied, excluding water and exempt solvents

Applicable Compliance Method:
 In accordance with OAC rule 3745-21-04(B)(5), facilities located in Ashtabula, Butler, Clark, Clermont, Cuyahoga, Delaware, Franklin, Geauga, Greene, Hamilton, Lake, Licking, Lorain, Lucas, Mahoning, Medina, Miami, Montgomery, Portage, Stark, Summit, Trumbull, Warren and Wood Counties shall use USEPA Method 24 to determine the VOC contents of the coatings. If an owner or operator determines that Method 24 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.

US EPA Method 24 or formulation data shall be used to determine the VOC contents of the cleanup materials.

F. Miscellaneous Requirements

1. None