

Facility ID: 1483060483 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: 1483060483 Emissions Unit ID: R001 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>
R001-Miscellaneous metal parts paint spray booth and metal parts solvent wipe cleaning and cleanup operations < 10 TPY with voluntary restrictions to avoid BAT - using compliance coatings	OAC rule 3745-31-02(A) PTI 14-05923	See term and condition A.2.a.
	OAC rule 3745-21-09(U)(1)(d) for coatings dried at temperatures not exceeding 200 degrees Fahrenheit	No owner or operator may cause, allow or permit the discharge into the ambient air of any volatile organic compounds from the coating line in excess of 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents.

2. **Additional Terms and Conditions**
  - (a) The Permit to Install 14-05923 for this air contaminant source takes into account the following voluntary restrictions as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) for VOC emissions:
    - i. The maximum annual coating usage for this emissions unit shall not exceed 600 gallons per year, excluding water and exempt solvents;
    - ii. The maximum annual solvent use for metal parts solvent wipe cleaning and cleanup operations shall not exceed 300 gallons per year; and
    - iii. The maximum VOC content of solvent used for metal parts solvent wipe cleaning and cleanup operations shall not exceed 8.0 pounds of VOC per gallon of solvent.

**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 this emissions unit:
  - a. The name and identification number of each coating, as applied; and
  - b. The VOC content of each coating (excluding water and exempt solvents), as applied.
2. The permittee shall collect and record the following information annually for the purpose of determining annual VOC emissions:
  - a. The name and identification of each solvent used for metal parts solvent wipe cleaning and cleanup operations;
  - b. The VOC content of each solvent used for metal parts solvent wipe cleaning and cleanup operations, in pounds per gallon;
  - c. The number of gallons of each solvent used for metal parts solvent wipe cleaning and cleanup operations;
  - d. The number of gallons (excluding water and exempt solvents) of each coating employed; and

e. The total VOC emissions from all coatings and cleanup materials employed, in tons, using the calculation methods provided in section E.2 and replacing the voluntary restriction amounts with the actual amounts as recorded in sections C.1 and C.2.

**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. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month in which the use of noncomplying coatings was recorded.

**E. Testing Requirements**

1. Compliance with the emission limitations specified in Section A of these terms and conditions shall be determined in accordance with the following methods:  
Emission Limitation:  
No owner or operator may cause, allow or permit the discharge into the ambient air of any volatile organic compounds from the coating line in excess of 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method:

If required, USEPA methods 24 and 24A shall be used to determine the VOC content for coatings. 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, 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.

Emission Limitation:

Voluntary restrictions which maintain the VOC emissions to less than 10 tons per year.

Applicable Compliance Method:

The annual VOC emissions voluntary restriction established through OAC rule 3745-31-02(A) was developed from the following equations using the information submitted by the permittee in PTI Application 14-05923, submitted on February 12, 2007:

600 gallons of coatings excluding water and exempt solvents/yr x 3.5 lbs of VOC/gallon of coating excluding water and exempt solvents x 1 Ton/2000 lbs = 1.05 TPY of VOC from surface coating.

300 gallons of thinner/yr x 8.0 lbs of VOC/gallon of thinner x 1 Ton/2000 lbs = 1.20 TPY of VOC from parts cleaning and cleanup operations.

Total VOC emissions considering voluntary restrictions = 2.25 TPY

**F. Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic pollutant will be less than 1.0 ton. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that a new permit to install application would be required for an emissions unit if changes in the composition of the materials or use of new materials would cause the emissions of any pollutant that has a listed Threshold Limit Value (TLV), 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"), to increase to above 1.0 ton per year.