

Facility ID: 1483080449 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: 1483080449 Emissions Unit ID: P001 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>
P001 - Overflow wood furniture stripping operation with methylene chloride based wood stripper	OAC rule 3745-31-05(A)(3) PTI 14-05566	Organic compound emissions (OC) shall not exceed 111 lbs/day. Organic compound emissions (OC) shall not exceed 3.61 tons/year.
	OAC rule 3745-21-07(G)	See terms and conditions A.2.a., B.1. through B.4. Exempt from requirements; see Term B.3.

2. Additional Terms and Conditions

- (a) The organic compound (OC) content of each stripping material employed in this emissions unit shall not exceed 9.92 lbs OC per gallon. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by prohibiting the use of photochemically reactive materials, compliance with the stripping material usage and OC content limitations and compliance with the OC emissions limitations.

B. Operational Restrictions

1. The maximum daily usage of stripping material for emissions unit P001 shall not exceed 15 gallons per day.
2. The maximum annual usage of stripping material for emissions unit P001 shall not exceed 975 gallons per year.
3. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5) is prohibited.
4. The containers holding stripping material or stripping material waste shall always be closed during storage, except when material is added or removed. In addition, the containers shall not be handled, opened or stored in a manner that may cause them to leak.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for emissions unit P001:
 - a. the name and identification number of each stripping material;
 - b. the volume in gallons, as applied, of each stripping material employed;
 - c. the OC content of each stripping material employed, in pounds OC per gallon of stripping material, as applied;
 - d. a record for each liquid organic material employed, indicating whether or not the liquid organic material is photochemically reactive as identified in OAC rule 3745-21-01(C)(5); and
 - e. the total OC emissions as calculated in term E.1.
2. The permittee shall maintain a copy of the latest analysis of the stripping material waste that is sent off-site for disposal. The analysis shall include the chemical composition of the waste stripping compound including the quantity, the methylene chloride content and the solids content.

D. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each

day during which any photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit. This report shall identify the cause for the use of photochemically reactive material(s) and the estimated total quantity of material(s) emitted each such day. This report shall be submitted to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.

2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing the use of a stripping material that exceeds the OC content limitation in term and condition A.2.a. or of any daily record showing an exceedance of the stripping material usage limitation in term and condition B.1. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days after any exceedance occurs.
3. The permittee shall submit annual reports which specify the annual stripping material usage and the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Emissions Limitations

111 lbs OC emissions/day
3.61 TPY OC emissions

Applicable Compliance Methods

Compliance with the OC emissions limitations shall be demonstrated by material balance calculations. In the case of emissions of methylene chloride from the stripping compound, the permittee may apply a creditable adjustment factor, identified as the Waste Credit Factor, for the methylene chloride retained in the waste stripping material sent off-site for disposal. The Waste Credit Factor shall be calculated from the records of the latest chemical composition analysis of the stripping material waste. The permittee shall assume that any other organic compounds in the stripping material are emitted to the air at 100%, unless testing proves otherwise. The total OC emissions shall be the sum of the methylene chloride emissions and the emission of the other organic compound contents in the stripping material.

daily methylene chloride emissions:

OC content (lb methylene chloride/lb stripping material) x coating density (lb stripping material/gal stripping material) x Waste Credit Factor x actual usage (gal stripping material/day) = lbs methylene chloride emissions/day

daily other (non-methylene chloride) organic compound emissions:

OC content (lb non-methylene chloride OC/lb stripping material) x coating density (lb stripping material/gal stripping material) x actual usage (gal stripping material/day) = lbs non-methylene chloride OC emissions/day

annual methylene chloride emissions:

OC content (lb methylene chloride/lb stripping material) x coating density (lb stripping material/gal stripping material) x Waste Credit Factor x actual usage (gal stripping material/year) x Ton/2000 lbs = TPY methylene chloride emissions

annual remaining organic compound emissions:

OC content (lb non-methylene chloride OC/lb stripping material) x coating density (lb stripping material/gal stripping material) x actual usage (gal stripping material/year) x Ton/2000 lbs = TPY non-methylene chloride OC emissions

2. Emissions Limitations

9.92 lbs OC per gallon stripping material

Applicable Compliance Method

Formulation data or USEPA method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the OC contents of the inks and coatings.

3. The permittee shall have the waste stripping material analyzed for the chemical composition in order to determine the solids content and methylene chloride content in the waste that is sent off-site for disposal. This analysis is to certify the Waste Credit Factor (See term and condition E.1) for methylene chloride that is retained in the waste. This one time analysis shall be conducted using USEPA Reference Method 24 or an appropriate substitute ASTM Method.
4. Compliance with the usage limitations in terms and conditions B.1 and B.2 shall be demonstrated by the record keeping in terms and conditions in C.1.
5. Compliance with the operational restriction in term and condition B.3 shall be demonstrated by the record keeping in terms and conditions in C.1.

F. Miscellaneous Requirements

1. None