Facility ID: 1483090257 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: 1483090257 Emissions Unit ID: K004 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
line #3 steel drum coating	OAC rule 3745-31-05(A)(3) PTI 14-3933	See Sections A.2.a, A.2.b and A.2.c below.
	OAC rule 3745-21-09(U)(1)(e)	The volatile organic compound (VOC) content limitation specified by this rule is the same as the VOC content limitation established pursuant to OAC rule 3745-31-05(A)(3). See Section A.2.a.i below.
	OAC rule 3745-21-09(U)(1)(f)	The VOC content limitation specified by this rule is less stringent than the VOC content limitation established pursuant to OAC rule 3745-31-05(A)(3). See Section A.2.a.ii below.

2. **Additional Terms and Conditions**

   (a) The VOC content, as applied, of each coating or cleanup material employed in emissions units K001 through K005 shall not exceed the following:

   i. 4.3 pounds of VOC per gallon of coating, excluding water and exempt solvents, for the interior coating of a steel pail or drum;

   ii. 3.34 pounds of VOC per gallon of coating, excluding water and exempt solvents, for the exterior coating of a steel pail or drum; and

   iii. 7.5 pounds of VOC per gallon of cleanup materials.
   The VOC emissions from emission units K001 through K005 combined shall not exceed the following:

   i. from the use of exterior coatings: 2,672 pounds of VOC emissions per day; and 65.7 tons of VOC emissions per year, based upon a rolling, 12-month summation;

   ii. from the use of interior coatings: 2,795 pounds of of VOC emissions per day; and 25.6 tons VOC emissions per year, based upon a rolling, 12-month summation; and

   iii. from the use of cleanup materials: 563 pounds of VOC emissions per week; and 6.0 tons of VOC emissions per year, based upon a rolling, 12-month summation.
   The combined VOC emissions from emissions units K001 through K005 shall not exceed 97.3 tons per year (TPY), based upon a rolling, 12-month summation of the VOC emissions.
   The total allowable usage of hazardous air pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 10 TPY for any single HAP and 25 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

B. **Operational Restrictions**

1. The maximum coating and cleanup material usages for emission units K001 through K005 combined shall not exceed the following, based upon rolling, 12-month summations of the coating and cleanup material usage figures:

   a. 39,340 gallons per year of exterior coatings;

b. 11,896 gallons per year of interior coatings; and

c. 1,600 gallons per year of cleanup materials.

2. The permittee shall not employ a combined total of coating and cleanup materials in excess of 800 gallons per day.

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

1. The permittee shall maintain the following daily records for each surface coating and cleanup material employed in emission units K001 through K005:

a. the company identification of each interior coating, exterior coating, and cleanup material;

b. the number of gallons of each interior coating and exterior coating, excluding water and exempt solvents, and each cleanup material employed;

c. the total combined number of gallons of all interior coatings, exterior coatings and cleanup materials employed;

d. the VOC content, in pounds of VOC per gallon, of each interior coating, exterior coating, excluding water and exempt solvents;

e. the VOC content, in pounds of VOC per gallon, of each cleanup material employed; and

f. the daily individual VOC emissions, in pounds, of all interior coatings [summation of (b) x (d) for all interior coatings employed], exterior coatings [summation of (b) x (d) for all exterior coatings employed], and cleanup materials [summation of (b) x (e) for all cleanup materials employed], respectively.

2. The permittee shall maintain records of the total weekly VOC emissions from all cleanup materials employed, in pounds, from emission units K001 through K005 [summation of C.1.f for each day of the calendar week].

3. The permittee shall maintain the following monthly records for surface coatings and cleanup materials employed in emission units K001 through K005:

a. for each month, the individual rolling, 12-month usage summations, in gallons, of interior coatings, exterior coatings, and cleanup materials;

b. for each month, the individual rolling, 12-month VOC emission summations, in tons, from interior coatings, exterior coatings and cleanup materials (this shall include the information for the current month and the preceding eleven calendar months); and

c. for each month, the total combined rolling, 12-month VOC emission summations, in tons, from interior coatings, exterior coatings and cleanup materials (i.e., the summation of the individual VOC emissions as calculated in (b)). This shall include the information for the current month and the preceding eleven calendar months.

4. The permittee shall collect and record the following information each month for the entire facility:

a. the name and identification number of each coating employed;

b. the individual HAP content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;

c. the total combined HAP content of each coating, in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from (b));

d. the number of gallons of each coating employed;

e. the name and identification of each cleanup material employed;

f. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;

g. the total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (sum all the individual HAP contents from (f));

h. the number of gallons of each cleanup material employed;
i. the total individual HAP usage for each HAP from all coatings and cleanup materials employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each coating plus the sum of (f) times (h) for each cleanup material (and divided by 2,000 lbs/ton if the units are in tons)];

j. the total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material (and divided by 2,000 lbs/ton if the units are in tons)];

k. the updated rolling, 12-month summation of usage for each individual HAP emitted**, in tons (This shall include the information for the current month and the preceding eleven calendar months. The following shall be included when the facility has yet to record a full year of records. For the first twelve months following the issuance of the permit, this shall be a cumulative total for all months since the issuance of the PTI.); and

l. the updated rolling, 12-month summation of usage for total combined HAPs emitted**, in tons. This shall include the information for the current month and the preceding eleven calendar months. The following shall be included when the facility has yet to record a full year of records. For the first twelve months following the issuance of the permit, this shall be a cumulative total for all months since the issuance of the PTI.

* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting

your Hamilton County Department of Environmental Services' contact. This information does not have to be kept on a individual emissions unit basis.

** This assumes the HAP(s) emitted are the same as the amounts of HAP(s) used since all HAP(s) used evaporated.

D. **Reporting Requirements**

1. The permittee shall submit quarterly deviation reports to the Hamilton County Department of Environmental Services that summarize all exceedances of the individual and combined VOC emission limitations, the individual and combined HAP emission limitations, and the individual coating and cleanup material usage restrictions, which are all based on a rolling, 12-month summation. If no exceedances occurred during the calendar quarter, then the report shall state that there were no exceedances. The permittee shall submit such reports by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter (October through December, January through March, April through June, and July through September, respectively).

2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing the use of noncomplying coatings or cleanup materials (i.e., for VOC content), any exceedance of the combined coating and cleanup material usage limitation and any exceedance of the daily VOC emission limitation for coatings. In addition, the permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the weekly VOC emission limitation for cleanup materials. 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.

3. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services that summarize the total VOC emissions, in tons, and the total individual and combined HAP emissions, in tons, from all interior coatings, exterior coatings, and cleanup materials employed in emission units K001 through K005, for each calendar year. The reports shall also specify the total usage, in gallons, of all exterior coatings, interior coatings, and cleanup materials employed in emission units K001 through K005. The permittee shall submit such reports by January 31 of each year and shall cover the previous calendar year.

E. **Testing Requirements**

1. Compliance with the VOC content limitations, VOC emission limitations, HAP emission limitations and material usage restrictions specified in Sections A.2, B.1 and B.2 shall be determined by the following methods:
VOC Content Limitations: 4.3 pounds of VOC per gallon of coating, excluding water and exempt solvents, for the interior coating of a steel pail or drum; 3.34 pounds of VOC per gallon of coating, excluding water and exempt solvents, for the exterior coating of a steel pail or drum; 7.5 pounds of VOC per gallon of cleanup material.

Applicable Compliance Method: Compliance with the VOC content limitations for coatings and cleanup materials shall be based upon the record keeping requirements specified in Section C.1. In accordance with OAC rule 3745-21-04(B)(5), U.S. EPA Method 24 shall be used to determine the VOC content for coatings and cleanup materials. If an owner or operator determines that Method 24 cannot be used for a particular coating, the owner or operator shall so notify the Administrator of the U.S. EPA and shall use formulation data for that coating to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24. Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of any cleanup material. Formulation data shall be used to determine the HAP content of any coating or cleanup material.
VOC Emission Limitations: The combined total VOC emissions from emission units K001 through K005 shall not exceed the following amounts:

exterior coatings: 2,672 lbs of VOC emissions/day;
interior coatings: 2,795 lbs of VOC emissions/day; and
cleanup materials: 563 lbs of VOC emissions/week.

Applicable Compliance Method: Compliance with the daily and weekly VOC emission limitations shall be determined by the record keeping requirements specified in Sections C.1 and C.2, respectively. In addition, the actual VOC emissions may be determined by employing the following equations:

i. actual coating usage, excluding water and exempt solvents (gallons/day) x VOC content, excluding water and exempt solvents (lbs of VOC/gallon) = lbs of VOC emissions/day from exterior coatings

ii. actual coating usage, excluding water and exempt solvents (gallons/day) x VOC content, excluding water and exempt solvents (lbs of VOC/gallon) = lbs of VOC emissions/day from interior coatings

iii. actual cleanup usage (gallons/week) x VOC content (lbs of VOC/gallon) = lbs of VOC emissions/week from cleanup materials
VOC Emission Limitations: The annual VOC emissions from emission units K001 through K005 shall not exceed a combined total of 97.3 TPY, based upon a rolling, 12-month summation, with individual amounts as specified below:

exterior coatings: 65.7 TPY of VOC emissions, based upon a rolling, 12-month summation;
interior coatings: 25.6 TPY of VOC emissions, based upon a rolling, 12-month summation; and
cleanup materials: 6.0 TPY of VOC emissions, based upon a rolling, 12-month summation.

Applicable Compliance Method: Compliance with the annual VOC emission limitations shall be determined by the record keeping requirements specified in Sections C.3.b and C.3.c. In addition, compliance with annual VOC emission limitations is ensured if compliance is maintained with the VOC content limitations and annual material usage restrictions.
HAP Emission Limitations: not to equal or exceed 10 TPY for any single HAP; not to equal or exceed 25 TPY for any combination of HAPs

Applicable Compliance Method: Compliance with the HAP emission limitations shall be determined by the record keeping requirements specified in Section C.4.
Material Usage Restrictions: The material usage restrictions for emission units K001 through K005 shall not exceed a combined total of 800 gallons per day for coatings and cleanup materials; 39,340 gallons per year of

exterior coatings, based upon a rolling 12-month summation; 11,896 gallons per year of interior coatings, based upon a rolling 12-month summation; 1,600 gallons per year of cleanup materials, based upon a rolling 12-month summation

Applicable Compliance Method: Compliance with the daily combined material usage restriction for coatings and cleanup materials shall be determined by the record keeping requirements specified in Section C.1. Compliance with the annual material usage restrictions for coatings and cleanup materials shall be determined by the record keeping requirements specified in Section C.3.

F. **Miscellaneous Requirements**

1. None