

Facility ID: 1483090313 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: 1483090313 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>
aluminum wheel paint line with drying oven and thermal incinerator	OAC rule 3745-31-05(A)(3) (PTI 14-1972)	163 lbs of volatile organic compound (VOC)/day and 19.8 tons per year (TPY) of VOC, excluding emissions from cleanup materials 19.4 TPY of VOC, from cleanup materials
	OAC rule 3745-21-09(B)(6)	See term and condition A.2.a below. The control measures specified by this rule are less stringent than the control measures established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- (a) The permittee shall maintain a capture system and a thermal incinerator for this emissions unit that maintains a VOC capture efficiency, which is at least 85%, by weight, and VOC emission destruction efficiency, which is at least 95%, by weight.
The VOC content, as applied, of each coating employed shall not exceed the following limitations, in pounds of VOC per gallon of coating, excluding water and exempt solvents:

Coating Type VOC Content (lbs/gallon)

Primer 6.50
Color No. 1 6.76
Color No. 2 4.85

 The VOC content of each cleanup material employed in this emission unit shall not exceed 7.30 lbs of VOC/gallon of cleanup material.

B. Operational Restrictions

1. The usages of the coatings employed shall not exceed the following limits:

Coating Type Daily Usage (gallons/day) Annual Usage (gallons/year)

Primer -- 13,000
Color No. 1 -- 13,000
Color No. 2 -- 16,500

Total 177 42,500
2. The permittee shall store spent cleanup materials in drums with tight-fitting lids to prevent evaporative loss.
3. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 1,400 degrees Fahrenheit.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary

by the permittee.

The permittee shall collect and record the following information each day for the control equipment:

- a. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit; and
 - b. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.
2. The permittee shall maintain daily records of the following information for this emissions unit:
 - a. the name and identification number of each coating and cleanup material employed;
 - b. the VOC content of each primer coating, in pounds per gallon, excluding water and exempt solvents, as applied;
 - c. the VOC content of each Color No. 1 coating, in pounds per gallon, excluding water and exempt solvents, as applied;
 - d. the VOC content of each Color No. 2 coating, in pounds per gallon, excluding water and exempt solvents, as applied;
 - e. the number of gallons of primer employed, excluding water and exempt solvents;
 - f. the number of gallons of Color No. 1 coating employed, excluding water and exempt solvents;
 - g. the number of gallons of Color No. 2 coating employed, excluding water and exempt solvents;
 - h. the total number of gallons of coatings employed [summation of (C.2.e for all primer coatings) + (C.2.f for all Color No. 1 coatings) + (C.2.g for all Color No. 2 coatings)];
 - i. the total uncontrolled VOC emissions from all coatings employed, in pounds {the summation of [(b x e) for all primer coatings] + [(c x f) for all Color No. 1 coatings] + [(d x g) for all Color No. 2 coatings]}; and
 - j. the calculated controlled VOC emissions from all coatings, in pounds [(C.2.i) x (1 minus the overall fractional control efficiency of the thermal incinerator, as determined during the most recent emission test that demonstrated that the emissions unit was in compliance)].
 3. The permittee shall maintain monthly records of the following:
 - a. the VOC content of each cleanup material employed, in pounds per gallon;
 - b. the number of gallons of each cleanup material employed; and
 - c. the total VOC emissions from all cleanup materials employed, in pounds [summation of (a x b) for all cleanup materials].
 4. The permittee shall collect and record the following information for each calendar year:
 - a. the total controlled VOC emissions from all coatings, in tons (summation of C.2.j for the calendar year divided by 2,000);
 - b. the total VOC emissions from all cleanup materials, in tons (summation of C.3.c for the calendar year divided by 2,000);
 - c. the total number of gallons of primer coating employed, excluding water and exempt solvents (summation of C.2.e for the calendar year);
 - d. the total number of gallons of Color No. 1 coating employed, excluding water and exempt solvents (summation of C.2.f for the calendar year);
 - e. the total number of gallons of Color No. 2 coating employed, excluding water and exempt solvents (summation of C.2.g for the calendar year); and
 - f. the total number of gallons of all coatings employed [the summation of (C.4.c for all primer coatings) + (C.4.d for all Color No. 1 coatings) + (C.4.e for all Color No. 2 coatings)].

D. Reporting Requirements

1. The permittee shall submit quarterly reports of the following records:
 - a. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit; and
 - b. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

These quarterly reports shall be submitted by April 30, July 30, October 30, and January 30 of each year, and shall cover the records for the previous calendar quarters.
2. The permittee shall notify the Hamilton County Department of Environmental Services of any daily record showing an exceedance of the daily VOC emission limitation, daily material usage restriction and/or use of non complying coatings or cleanup materials (i.e., for VOC contents). 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 during which the exceedance(s) occurred.

3. The permittee shall also submit annual reports that specify the total amount of controlled VOC emissions (in tons), the total VOC emissions (in tons) from cleanup materials and the total amount of coating usage (in gallons) of primer coatings, Color No. 1 coatings, Color No. 2 coatings, and of all coatings employed from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted 6 months prior to permit expiration.
 - b. The emission testing shall be conducted to demonstrate compliance with the capture efficiency and control efficiency limitations of not less than 85% and 95%, by weight, for VOC, respectively.
 - c. The capture efficiency shall be determined using the test methods specified in 40 CFR, Part 51, Appendix M, Method 204 through 204F, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency as specified in the U.S. EPA Guidelines for Determining Capture Efficiency, dated January 9, 1995. Ohio EPA will consider the request, including an evaluation of the applicability. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.
 - d. The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Hamilton County Department of Environmental Services.
2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Hamilton County Department of Environmental Services. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Hamilton County Department of Environmental Services' refusal to accept the results of the emission tests.

Personnel from the Hamilton County Department of Environmental Services shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Hamilton County Department of Environmental Services within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Hamilton County Department of Environmental Services.

3. Compliance with the daily VOC emission limitation, annual VOC emission limitations, VOC content limitations and material usage restrictions shall be determined as follows:

- a. Emission Limitation: 163 lbs of VOC/day, excluding emissions from cleanup materials

Applicable Compliance Method: Compliance with the daily emission limitation shall be determined by the record keeping requirements specified in Section C.2 of this permit.

- b. Emission Limitation: 19.8 TPY of VOC, excluding emissions from cleanup materials

Applicable Compliance Method: Compliance with the annual VOC emission limitation shall be determined by the record keeping requirements specified in Section C.4 of this permit.

- c. Emission Limitation: 19.4 TPY of VOC from cleanup materials

Applicable Compliance Method: Compliance with the annual VOC emission limitation shall be determined by the record keeping requirements specified in Section C.4 of this permit.

- d. VOC Content Limitations:

Coating Type VOC Content

Primer 6.50 lbs/gallon, excluding water and exempt solvents
 Color No. 1 6.76 lbs/gallon, excluding water and exempt solvents
 Color No. 2 4.85 lbs/gallon, excluding water and exempt solvents
 Cleanup Material 7.30 lbs/gallon

Applicable Compliance Method: Compliance with the VOC content limitations shall be determined by the record keeping requirements specified in Sections C.2 and C.3.

- e. Material Usage Restrictions:

Coating Type Daily Usage (gallons/day) Annual Usage (gallons/year)

Primer -- 13,000
 Color No. 1 -- 13,000
 Color No. 2 -- 16,500

Total 177 42,500

Applicable Compliance Method: Compliance with the material usage restrictions shall be determined by the

record keeping requirements specified in Sections C.2 and C.4.

4. Compliance with the capture and control efficiency requirements for VOC emissions shall be determined by stack testing using the methods specified in Section E.1 of this permit.

F. **Miscellaneous Requirements**

1. None