

Facility ID: 1483140304 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: 1483140304 Emissions Unit ID: K003 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>
miscellaneous metal parts spray booth	OAC rule 3745-31-05 (PTI 14-4610)	69.8 lbs/day of volatile organic compounds (VOC), 9.49 TPY of VOC
	OAC rule 3745-21-09(U)(1)	See section A.2 below. exempt pursuant to OAC rule 3745-21-09(U)(2)(f)(ii)

2. **Additional Terms and Conditions**
  - (a) The VOC content, as applied, of each coating employed shall not exceed 4.80 pounds of VOC per gallon of coating, excluding water and exempt solvents.  
The VOC content of all cleanup materials employed shall not exceed 7.25 pounds of VOC per gallon of cleanup material.  
The actual emissions 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 determined on a rolling, 12-month summation.

**B. Operational Restrictions**

1. The maximum usage of coatings shall not exceed 10 gallons per day and 3,650 gallons per year.
2. The maximum usage of cleanup materials shall not exceed 3 gallons per day and 200 gallons per year.

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

1. The permittee shall collect and record the following information each day:
  - a. the name and identification number of each coating and cleanup material employed;
  - b. the number of gallons of each coating employed, excluding water and exempt solvents, as applied;
  - c. the number of gallons of each coating employed, as applied;
  - d. the VOC content of each coating (excluding water and exempt solvents), as applied, in pounds per gallon;
  - e. the number of gallons of each cleanup material employed;
  - f. the VOC content of each cleanup material, in pounds per gallon; and
  - g. the total VOC emissions from all coatings and cleanup materials employed, in pounds [summation of (b x d) + (e x f) for each coating and cleanup material].
2. The permittee shall collect and record the following information annually:
  - a. the total VOC emissions from all coatings and cleanup materials employed, in tons per year [summation of C.1.g divided by 2,000 lbs/ton];
  - b. the total number of gallons of coatings employed [summation of C.1.c]; and
  - c. the total number of gallons of cleanup materials employed [summation of C.1.e]

3. The permittee shall collect and record the following information each month for the entire facility:
- the name and identification number of each coating employed;
  - the individual HAP content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;
  - 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)];
  - the number of gallons of each coating employed;
  - the name and identification of each cleanup material employed;
  - the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;
  - 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)];
  - the number of gallons of each cleanup material employed;
  - the total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in 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 the total sum divided by 2000];
  - the total combined HAP emissions from all coatings and cleanup materials employed, in tons per month [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material and the total sum divided by 2000];
  - the updated rolling, 12-month summation for each individual HAP emissions, in tons (this shall include the information for the preceding 12 calendar months); and
  - The updated rolling, 12-month summation for total combined HAP emissions, in tons (this shall include the information for the preceding 12 calendar months).

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. This information does not have to be kept on a line-by-line basis.

#### D. Reporting Requirements

- The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing that the coating line employed more than the applicable maximum coating and cleanup material usage limits or exceeded the VOC content limits. The notification shall be submitted within 30 days of exceedance and shall include a copy of such record, if applicable. If no exceedances occurred during the reporting period, then a report is required stating so.
- The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP emission limitations set forth in Section A.2. The permittee shall submit quarterly reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance. If no exceedances occurred during the reporting period, then a report is required stating so.
- The permittee shall submit annual reports which specify the total VOC emissions, individual HAP emissions, and combined HAP emissions from this emissions unit for the previous calendar year. The permittee shall submit these reports to Hamilton County Department of Environmental Services. These reports shall be submitted by January 31 of each year for the preceding calendar year.

#### E. Testing Requirements

- Compliance with the VOC emissions limitations in Section A.1 shall be determined by the record keeping requirements in Sections C.1 and C.2.
- Compliance with the HAP emission limitations in Section A.2.c shall be determined by the record keeping requirements in Section C.3.
- Compliance with the operational restrictions in Section B shall be determined by the record keeping requirements in Sections C.1 and C.2.
- USEPA Methods 24 or 24A shall be used to determine the VOC content of coatings. If, pursuant to section 4.3 of Method 24, 40 CFR, Part 60, Appendix A, the permittee 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. Formulation data or Method 24 or 24A shall be used to determine the VOC content of any cleanup material.

#### F. Miscellaneous Requirements

- This permit allows the use of the coatings and cleanup materials specified by the permittee in the application for PTI number 14-4610. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the VOC emission limitations specified in this permit were established in accordance with the Ohio EPA's "Air Toxics Policy" and are based on both the coating and cleanup material formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the Screen 3 model and a comparison of the predicted 1-hour maximum ground-level concentration to the MAGLC.

The following summarizes the results of the modeling for each pollutant:

Pollutant: xylene  
TLV (ug/m3): 434,000

Maximum Hourly Emission Rate (lbs/hr): 3.70

Predicted 1-Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 2,112

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 10,333

Any of the following changes may be deemed a "modification" to the emissions unit and, as such, prior notification to and approval from the appropriate Ohio EPA District Office or local air agency are required, including the possible issuance of modifications to PTI number 14-4610 and the operating permit:

a. any changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;

b. any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of any MAGLC specified in the above table;

c. any change to the emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01; and

d. any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in the emission of any of the exempted organic compounds included in the definition of "VOC" [OAC rule 3745-21-01(B)(6)].