Facility ID: 1483140408 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: 1483140408 Emissions Unit ID: K002 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
Overspray paint spray booth with dry filtration system	OAC rule 3745-31-05 (PTI 14-4547)	59.42 lbs/day and 10.85 tpy of VOC 2.38 lbs/day and 0.44 tpy of PM/PM10 See A.2.a - A.2.d and B.1
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack associated with this emissions unit shall not exceed 20 percent opacity, as a 6-minute average, except as specified by rule.
	OAC rule 3745-17-11(B)	Less stringent than the emission limitations required by OAC rule 3745-31-05.
	OAC rule 3745-21-09(U)(2)(f)	Exempt from the requirements of OAC rule 3745-21-09(U)(1).

2. **Additional Terms and Conditions**

   (a) The VOC content of each coating employed shall not exceed 5.77 pounds per gallon, excluding water and exempt solvents, as employed.
   The VOC content of each cleanup material employed shall not exceed 7.49 pounds per gallon, as employed.
   Emissions of hazardous air pollutants (HAPs) from this facility, as identified in Section 112(b) of Title III of the Clean Air Act, shall not exceed 10 tpy of any single HAP and 25 tpy for any combination of HAPs. Compliance with the these limitations shall be determined on a rolling, 12-month basis.
   For purposes of determining best available technology under OAC rule 3745-31-05, all PM emissions from this emissions unit are considered to be PM10. The above PM/PM10 limitation reflects potential to emit for this emissions unit; therefore, no additional record keeping or reporting is required.

B. **Operational Restrictions**

1. The permittee shall not employ more than 10 gallons per day and 3650 gallons per year of coatings and cleanup materials (combined).

2. The permittee shall operate the dry filtration system whenever the emissions unit is in operation.

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

1. The permittee shall collect and record the following information each day for this emissions unit:

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

   b. the volume, in gallons, of each coating and cleanup material, excluding water and exempt solvents, as employed;

   c. the VOC content of each coating and cleanup material, in pounds per gallon, excluding water and exempt solvents, as employed;

   d. the VOC emissions, in pounds per day, i.e., the sum of (C.1.b)x(C.1.c) for each coating and cleanup material identified in C.1.a; and

   e. the total volume, in gallons, of all coatings and all cleanup materials, excluding water and exempt solvents,

as employed.

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

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

b. the individual HAP content of each coating and cleanup material, in pounds per gallon, as employed;

c. the total, combined HAPs content of each coating and cleanup material, in pounds per gallon, as employed (i.e., the sum of the individual HAP contents identified in C.2.b);

d. the volume of each coating and cleanup material employed, in gallons;

e. the total, individual HAP emissions for each HAP from all coatings and cleanup materials employed, in pounds or tons per month, (i.e., the sum of (C.2.b)x(C.2.d) for each HAP contained in each coating and cleanup material identified in C.2.a);

f. the total, combined HAPs emissions from all coatings and cleanup materials employed, in pounds or tons per month, (i.e., the sum of (C.2.c)x(C.2.d) for all coatings and cleanup materials identified in C.2.a);

g. the rolling, 12-month total emissions for each individual HAP, in pounds or tons (This shall include the information for the current month and the preceding eleven calender months. For the first twelve months following the issuance of the permit, this shall be a cumulative total for all months since the issuance of PTI 14-4547.); and

h. the rolling, 12-month total emissions for combined HAPs, in pounds or tons (This shall include the information for the current month and the preceding eleven calender months. For the first twelve months following the issuance of the permit, this shall be a cumulative total for all months since the issuance of PTI 14-4547.).

[Note: A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting Hamilton County Department of Environmental Services. This information does not have to be kept separately for each emissions unit.]

3. The permittee shall calculate and record, on quarterly basis, the total VOC emissions from all coatings and cleanup materials employed, in tons, for the purpose of determining annual VOC emissions. These records may be derived from the records required in section C.1 of this permit.

D. **Reporting Requirements**

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing any exceedance of the daily coating and cleanup materials usage restriction in section B.1 of this permit. 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 the exceedance occurs.

2. The permittee shall submit deviation (excursion) reports which identify any exceedances of the daily VOC emissions limitation. Such reports shall include a copy of the record showing the exceedance and a description of the corrective actions that were taken to achieve compliance. These reports shall be submitted as specified in Part I, General Condition 3 of this permit.

3. The permittee shall submit deviation (excursion) reports which identify any exceedances of the coating and cleanup material content limitations for VOC specified in sections A.2.a and A.2.b of this permit. Such reports shall include a copy of the record showing the exceedance and a description of the corrective actions that were taken to achieve compliance. These reports shall be submitted as specified in Part I, General Condition 3 of this permit.

4. The permittee shall submit deviation (excursion) reports which identify any exceedances of the rolling, 12-month HAP emission limitations contained in section A.2.c of this permit. The reports shall include a copy of the record documenting each such exceedance, and a description of the corrective actions that were taken to achieve compliance. These reports shall be submitted as specified in Part I, General Condition 3 of this permit.

5. The permittee shall submit annual deviation (excursion) reports which identify any exceedances of the annual coating and cleanup materials usage restriction in section B.1 of this permit. These reports shall be submitted by January 31 of each year.

6. The permittee shall submit annual reports which specify the VOC emissions, individual HAP emissions, and combined HAPs emissions from this emissions unit during the previous calendar year. These reports shall be submitted by January 31 of each year.

E. **Testing Requirements**

1. Compliance with the emission limitations in section A of these terms and conditions shall be demonstrated in accordance with the following methods:
Emission Limitation:

59.42 lbs/day and 10.85 tpy of VOC

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping and reporting requirements of sections C.1 and D.3 of this permit. Emissions may be calculated as follows:

daily VOC emissions (lbs/day) = the sum of [usage (gal/day)]x[VOC content (lbs VOC/gal, as applied)] for all coatings and cleanup materials employed; and

annual VOC emissions (tpy) = [the summation of daily VOC emissions]/[2000 lbs/ton].
Emission Limitation:

2.38 lbs/day and 0.44 tpy of PM/PM10

Applicable Compliance Method:

The applicable emission limitations were developed in PTI 14-4547 to reflect worst-case potential to emit:

daily PM/PM10 emissions = the sum of [usage (gal/day)]x[solids content (lb solid/lb coating)]x[coating density (lbs/gal)]x[1-0.25 (conservative transfer efficiency of 25%)]x[1-0.90 (manufacturer's minimum control efficiency)] for all coatings employed; and

annual PM/PM10 emissions = [the summation of daily PM/PM10 emissions]/[2000 lbs/ton].
Emission Limitation:

20 percent opacity as a 6-minute average

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible emissions observations using method 9 of 40 CFR Part 60, Appendix A, and the procedures specified in OAC rule 3745-17-03(B)(1).
Emission Limitation:

5.77 lbs VOC/gallon coating and 7.49 lbs VOC/gallon cleanup material

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping and reporting requirements of sections C.1 and D.2 of this permit.
Emission Limitation:

10 tpy of any HAP and 25 tpy of all HAPs

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping and reporting requirements of sections C.2 and D.6 of this permit.

2. All determinations of the HAP content, VOC content, solids content, and density of a coating and/or cleanup material shall be based on the coating/cleanup material as applied, including the addition of any thinner or viscosity reducer. The permittee shall determine the composition of the coatings/cleanup materials by formulation data supplied by the manufacturer of the coatings/cleanup materials, or, for VOC content, from an analysis of each coating/cleanup material, as received, by method 24 of 40 CFR Part 60, Appendix A.

   If the permittee uses the formulation data supplied by the manufacturer to determine coating/cleanup material composition, Ohio EPA may require the permittee to verify the VOC content of the coating/cleanup material by method 24 or an equivalent or alternative method.

F. **Miscellaneous Requirements**

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

   Pollutant: napthalene

   TLV (ug/m3): 52

   Maximum Hourly Emission Rate (lbs/hr): 13.04

   Predicted 1-Hour Maximum Ground-Level
   Concentration (ug/m3): 986.4

   MAGLC (ug/m3): 1238.1

2. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

   a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new 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. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);

   c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and

   d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

3. The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

   a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;

   b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and

   c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

   For any change to the emissions unit or its method of operation that either would 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, the permittee shall obtain a final permit to install prior to the change.