



State of Ohio Environmental Protection Agency

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P.O. Box 1049  
Columbus, OH 43216-1049

**RE: FINAL PERMIT TO INSTALL  
HAMILTON COUNTY  
Application No: 14-06017  
Fac ID: 1431371235**

**DATE: 6/12/2008**

Rumpke of Ohio Inc  
John Butler  
10795 Bughes Road  
Cincinnati, OH 452514598

**CERTIFIED MAIL**

Y	TOXIC REVIEW
	PSD
Y	SYNTHETIC MINOR
	CEMS
HHHHHH	MACT
	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, OH 43215

Sincerely,

*Michael W. Ahern*

Michael W. Ahern, Manager  
Permit Issuance and Data Management Section  
Division of Air Pollution Control

CC: USEPA

HCDES



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Permit To Install  
Terms and Conditions

Issue Date: 6/12/2008  
Effective Date: 6/12/2008

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**FINAL PERMIT TO INSTALL 14-06017**

Application Number: 14-06017  
Facility ID: 1431371235  
Permit Fee: **\$200**  
Name of Facility: Rumpke of Ohio Inc  
Person to Contact: John Butler  
Address: 10795 Bughes Road  
Cincinnati, OH 452514598

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**4932 Beech Street**  
**Norwood, Ohio**

Description of proposed emissions unit(s):  
**Container/truck paint spray booth.**

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

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Chris Korleski  
Director

## Part I - GENERAL TERMS AND CONDITIONS

### A. Permit to Install General Terms and Conditions

#### 1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

#### 2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

#### 3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

#### 4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air

contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

**5. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

**6. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

**7. Air Pollution Nuisance**

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

**8. Termination of Permit to Install**

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

**9. Construction of New Sources(s)**

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental

Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

**10. Public Disclosure**

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

**11. Applicability**

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

**12. Best Available Technology**

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

**13. Source Operation and Operating Permit Requirements After Completion of Construction**

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

**14. Construction Compliance Certification**

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

**15. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

**B. Permit to Install Summary of Allowable Emissions**

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

**SUMMARY (for informational purposes only)  
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons Per Year</u>
HAPs	9.9/24.9
VOC	13.1

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. Applicable Emissions Limitations and/or Control Requirements**

- The specific operations(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 specified in narrative form following the table.

**Operations, Property, and/or Equipment - (K002) - Container/truck paint spray booth**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
40 CFR Part 63, Subpart HHHHHH (40 CFR 63.11169-11180)	See terms and conditions A.2.g, A.2.h, A.2.i and A.2.j.
40 CFR 63.1-16 (40 CFR 63.11174)	Table 1 to Subpart HHHHHH of 40 CFR Part 63 - Applicability of General Provisions to Subpart HHHHHH shows which parts of the General Provisions in 40 CFR 63.1-16 apply.
<b>OAC rule 3745-31-05(A)(3)</b>	Emissions of Volatile Organic Compounds (VOC) shall not exceed 12.5 lb/hour and 13.1 tons per year.  See terms and conditions A.2.c and B.1. The requirements for this rule also include compliance with the requirements of OAC rule 3745-31-05(C), OAC rule 3745-17-07(A)(1), OAC rule 3745-17-11(C)(2)(b) and OAC rule 3745-21-09(U)(1)(d).
OAC rule 3745-17-11(C)(2)(b)	See term and condition A.2.b.
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 six-minute average, except as specified by rule.
<b>OAC rule 3745-21-09(U)(1)(d)</b>	See term and condition A.2.d.
OAC rule 3745-31-05(C) (Synthetic minor to avoid MACT and Title V permitting)	See terms and conditions A.2.f.

## 2. Additional Terms and Conditions

- 2.a** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the coating material usage restrictions, the VOC content limitations and the emission limitations.
- 2.b** The permittee shall install, operate, and maintain a dry particulate filter for the coating operations in accordance with the manufacturer's recommendations, instructions, and/or operating manual, with any modifications deemed necessary by permittee. The dry filtration system shall be employed during all periods of coating application to control particulate emissions.
- 2.c** Coatings applied in the refinishing of motor vehicles or mobile equipment shall not exceed 5.01 pounds of VOC per gallon of coating, excluding water and exempt solvents.
- 2.d** Coatings applied in the miscellaneous metal parts coating operations shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents.
- 2.e** The allowable hourly emission rate for VOC represents the maximum potential emissions from this emissions unit, taking into account the VOC limitation of term A.2.c. Therefore hourly record keeping is not required.
- 2.f** The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units K001 (Paint Spray Booth) and K002 (Container/truck paint spray booth), any de minimis emissions units as defined in OAC rule 3745-15-05, and any registration status and/or permit exempt emissions units shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance with the limitations in term A.2.f upon permit issuance.

- 2.g** All painters must be certified that they have completed training in the proper spray application of surface coatings and the proper setup and maintenance of spray equipment per 40 CFR 63.11173 (f). [40 CFR 63.11173(e)(1)]
- 2.h** All spray-applied coatings must be applied in a spray booth fitted with a type of filter technology that is demonstrated to achieve at least 98-percent capture of paint overspray that meets the requirements of 40 CFR 63.11173 (e)(2)(i), and (e)(2)(ii), (e)(2)(iii), or (e)(2)(iv). [40 CFR 63.11173 (e)(2)]

- 2.i All spray-applied coatings must be applied with a high volume, low pressure (HVLP) spray gun, electrostatic application, airless spray gun, air-assisted airless spray gun, or an equivalent technology that is demonstrated by the spray gun manufacturer to achieve transfer efficiency comparable to one of the spray gun technologies listed above for a comparable operation, and for which written approval has been obtained from the Administrator. [40 CFR 63.11173 (e)(3)]
- 2.j All paint spray gun cleaning must be done so that an atomized mist or spray of gun cleaning solvent and paint residue is not created outside of a container that collects used gun cleaning solvent. Spray gun cleaning may be done with, for example, hand cleaning of parts of the disassembled gun in a container of solvent, by flushing solvent through the gun without atomizing the solvent and paint residue, or by using a fully enclosed spray gun washer. A combination of non-atomizing methods may also be used. [40 CFR 63.11173 (e)(4)]

**B. Operational Restrictions**

- 1. The maximum coating usage for this emissions unit shall not exceed 5200 gallons per year.

**C. Monitoring and/or Recordkeeping Requirements**

- 1. See 40 CFR Part 63, Subpart HHHHHH (40 CFR 63.11169-11180)
- 2. The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry filtration system with any modifications deemed necessary by the permittee during the time period in which the dry filtration system is utilized. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
- 3. The permittee shall conduct periodic inspections of the dry filtration system to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee. The periodic inspections of the dry filtration system shall be performed at a frequency that is based upon the recommendation of the manufacturer, and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency. In addition to these periodic inspections, the permittee shall conduct a comprehensive inspection of the dry filtration system, not less than once each calendar year, while the emissions unit is shut down; and shall perform any needed maintenance and repair for the control device to ensure that it is operated in accordance with the manufacturer's recommendations.

The permittee shall document each inspection of the dry filtration system by maintaining a record that includes the date of the inspection, a description of each problem identified and the date it was corrected, a description of the maintenance and repairs performed, and the name of the person who performed the inspection. These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

4. In the event that the dry filtration system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee, the dry filtration system shall be expeditiously repaired or otherwise returned to operation in accordance with such requirements. The permittee shall maintain a record of those periods when the dry filtration system is not operating in accordance with such requirements. These records shall be maintained at the facility for not less than five years from the date of completion and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
5. The permittee shall collect and record the following information each month for the coating line and shall maintain this information at the facility for a period of **five** years:
  - a. the name and identification number of each coating, as applied; and
  - b. the mass of VOC per volume of each coating, excluding water and exempt solvents, as applied, calculated as follows:

$C_{\text{VOC},2}$  is the VOC content in pounds of VOC per gallon of coating, excluding water and exempt solvents calculated as follows:

$$C_{\text{VOC},2} = (D_c)(W_{\text{VOC}}) / V_s + V_{\text{VOC}}$$

where:

$D_c$  is the density of coating, in pounds of coating per gallon of coating.

$$W_{\text{VOC}} = W_{\text{VM}} - W_w - W_{\text{ES}}$$

$V_s$  is the volume fraction of solids in coating, in gallons of solids per gallon of coating.

$$V_{\text{VOC}} = V_{\text{VM}} - V_w - V_{\text{ES}}$$

$W_{\text{VM}}$  weight fraction of volatile matter in coating, in pound of volatile matter per pound of coating.

$W_w$  weight fraction of water in coating, in pound of water per pound of coating.

$W_{ES}$  weight fraction of exempt solvent in coating, in pound of exempt solvent per pound of coating.

$V_{VM}$  volume fraction of volatile matter in coating, in gallon of volatile matter per gallon of coating.

$V_w$  volume fraction of water in coating, in gallon of water per gallon of coating.

$V_{ES}$  volume fraction of exempt solvent in coating, in gallon of exempt solvent per gallon of coating.

This information does not have to be kept on a line-by-line basis, unless one or more of the lines or emissions units is subject to specific “gallons/year” and/or “tons/year” limitation in a Permit-to-install, where the above-mentioned information shall be maintained separately for each such line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.

6. The permittee shall collect and record the following information for the purpose of determining annual VOC emissions:
  - a. the name and identification of each cleanup material employed;
  - b. the VOC content of each cleanup material, in pounds per gallon;
  - c. the number of gallons of each cleanup material employed;
  - d. the number of gallons (excluding water and exempt solvents) of each coating employed; and
  - e. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons.

This information does not have to be kept on a line-by-line basis, unless one or more of the lines is a new emissions unit and subject to specific “gallons/year” and “tons/year” limitations, or just a “tons/year” limitation in a Permit-to-install. In such cases, for each such new emissions unit only, the above-mentioned information must be maintained separately for that line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.

7. The permittee shall collect and record the following information each month for emissions units K001 (Paint Spray Booth) and K002 (Container/truck paint spray

booth), and any de minimis defined in OAC rule 3745-15-05, any registration status and/or permit exempt emissions units:

- a. The name and identification number of each coating or solvent employed;
- b. The individual Hazardous Air Pollutant (HAP)\* content for each HAP of each coating or solvent in pounds of individual HAP per gallon of coating or solvent, as applied;
- c. The total combined HAP content of each coating or solvent in pounds of combined HAPs per gallon of coating or solvent, as applied [sum all the individual HAP contents from (b)];
- d. The number of gallons of each coating or solvent 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 emissions for each HAP from all coatings (or solvents) and cleanup materials employed, in pounds or tons per month [for each HAP the sum of (b) times (d) times the emissions factor (if applicable) for each coating or solvent plus the sum of (f) times (h) for each cleanup material plus individual HAP emissions from any de minimis, registration status and/or permit exempt emissions unit at the facility];
- j. The total combined HAP emissions from all coatings (or solvents) and cleanup materials employed, in pounds or tons per month [the sum of (c) times (d) times the emissions factor (if applicable) for each coating or solvent plus the sum of (g) times (h) for each cleanup material plus combined HAP emissions from any de minimis, registration status and/or permit exempt emissions unit at the facility];
- k. The updated rolling, 12-month summation of the individual HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and

- I. The updated rolling, 12-month summation of the combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven 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 Hamilton County Department of Environmental Services. This information does not have to be kept on a individual emissions unit basis.

8. The permit to install for this/these emissions unit(s) K002 was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee in the permit application. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN 3.0, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:
  - a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
    - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
    - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
  - b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
  - c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., 24 hours per day and 7 days per week, from that of 8 hours per day and 5 days per week. The resulting

calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Toxic Contaminant: xylene

TLV (mg/m<sup>3</sup>): 434.192

Maximum Hourly Emission Rate (lbs/hr): 3.25

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 95

MAGLC (ug/m<sup>3</sup>): 10,338

The permittee, has demonstrated that emissions of xylene from emissions unit(s) K002 is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

9. Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration", the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
  - c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a

“modification” or if a new toxic is emitted, or the modeled toxic(s) is/are expected to exceed the previous modeled level(s), then the permittee shall apply for and obtain a final permit-to-install prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit-to-install application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and may require the permittee to submit a permit-to-install application for the increased emissions.

10. The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F):
  - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
  - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F);
  - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
  - d. the documentation of the initial evaluation of compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.
11. The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

#### **D. Reporting Requirements**

1. See 40 CFR Part 63, Subpart HHHHHH (40 CFR 63.11169-11180)
2. The permittee shall notify the Hamilton County Department of Environmental Services of the date and length of time the dry filtration system was not in service during coating

application. 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 notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
4. The permittee shall also submit annual reports that specify the total VOC emissions and gallons of coatings used in this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
5. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any exceedance of the HAP emission limitations outlined in term and condition A.2.f. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively.)
6. The permittee shall submit annual reports to the appropriate Ohio EPA District Office or local air agency, documenting any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. If no changes to the emissions unit(s) or the exhaust stack have been made, then the report shall include a statement to this effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.

## **E. Testing Requirements**

1. Compliance with the emission limitations in Section A of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitations:  
Coatings applied in the refinishing of motor vehicles or mobile equipment shall not exceed 5.01 pounds of VOC per gallon of coating, excluding water and exempt solvents.

Coatings applied in the miscellaneous metal parts coating operations shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents.

**Applicable Compliance Method:**

In accordance with OAC rule 3745-21-04(B)(5), facilities located in Ashtabula, Butler, Clark, Clermont, Cuyahoga, Delaware, Franklin, Geauga, Greene, Hamilton, Lake, Licking, Lorain, Lucas, Mahoning, Medina, Miami, Montgomery, Portage, Stark, Summit, Trumbull, Warren and Wood Counties shall use USEPA Method 24 to determine the VOC contents of the coatings. If, pursuant to Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 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.

Facilities located in all other counties shall use USEPA Method 24 or formulation data to determine the VOC contents of the coatings.

US EPA Method 24 or formulation data shall be used to determine the VOC contents of the cleanup materials.

- b. Emission Limitation:  
Volatile Organic Compounds (VOC) shall not exceed 12.5 lb/hour.

Applicable Compliance Method:

Compliance with the above VOC emission limitation shall be determined by multiplying the VOC content of the coating, as applied, by the maximum hourly coating usage rate, as applied, of 2.5 gallons per hour.

- c. Emission Limitation:  
Volatile Organic Compounds (VOC) shall not exceed 13.2 TPY.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section C.5 and C.6.

- d. Emission Limitation:  
Visible PE from any stack serving this emissions unit shall not exceed 20% opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

When requested by the Ohio EPA, compliance with the above visible emission limitation shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in USEPA Reference Method 9.

- e. Emissions limitation:

The total allowable emissions of Hazardous Air Pollutants (HAPs) from the emissions units identified in term and condition A.2.f shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs.

Applicable Compliance Method:

Compliance with the HAP emission limitations shall be based on the record keeping requirements established in term and condition C.7.

## **F. Miscellaneous Requirements**

1. The requirements in Part II.A.2.g, A.2.h, A.2.i, A.2.j, C.1 and D.1 will become non-applicable to this emissions unit upon approval by the administrator or Director of exemption from 40 CFR 63 Subpart HHHHHH, as provided in 40 CFR 63.11170(a)(2). If this emissions unit begins using coatings containing target HAPs as defined in 40 CFR 63.11180, the requirements in Part II.A.2.g, A.2.h, A.2.i, A.2.j, C.1 and D.1 will remain applicable.