Facility ID: 1409030923 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: 1409030923 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
touch-up paint spray booth for miscellaneous metal parts	OAC rule 3745-31-05(A)(3) (PTI 14-04949)	21.0 lbs of volatile organic compound (VOC)/day, coatings only 3.9 tons per year (TPY) of VOC The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1)(c).
	OAC rule 3745-21-09(U)(1)(c)	3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, based upon a daily, volume-weighted average.

2. **Additional Terms and Conditions**

   (a) The VOC content of each cleanup material shall not exceed 7.3 pounds per gallon.
   The daily emission limitation specified above is based upon the emissions unit's potential to emit (the maximum hourly emission rate multiplied by 24 hours/day). Therefore, no daily records are required to demonstrate compliance with this limit.

B. **Operational Restrictions**

1. The maximum cleanup material usage for this emissions unit shall not exceed 2.5 gallons per month and 30 gallons per year.

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

1. The permittee shall collect and record the following information on a daily basis for the purpose of determining the daily, volume-weighted average VOC content for all coatings employed in this emissions unit:

   a. the name and identification number of each coating, as applied;

   b. the VOC content of each coating, in pounds per gallon, excluding water and exempt solvents, as applied;

   c. the number of gallons of each coating employed, excluding water and exempt solvents; and

   d. the daily, volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for Cvoc,2.

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

   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; and

   d. the total number of gallons of all cleanup materials employed.

3. The permit to install for this emissions unit was evaluated based on the actual materials employed and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. Ohio EPA's "Review of New Sources of Air Toxics Emissions" policy ("Air Toxics Policy") was

applied for each toxic pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant:

Pollutant: Cyclohexanone
TLV (ug/m3): 96,300
Maximum Hourly Emission Rate (lbs/hr): 0.37
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 646 (emissions units K001 and K002, combined)
MAGLC (ug/m3): 2,293

Physical changes to or in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxics Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxics Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxics Policy" include the following:
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 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 pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxics Policy" will be satisfied with the above changes, Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect and record the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxics Policy":

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxics Policy"; and
c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxics Policy" for the change.

D. **Reporting Requirements**

1. 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). In addition, the permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the monthly usage 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.

E. **Testing Requirements**

1. Compliance with the VOC emission limitations, VOC content limitations and cleanup material usage limitations shall be determined as follows:

a. VOC Content Limitation: 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents; 7.3 pounds of VOC per gallon of cleanup material

Applicable Compliance Method: Compliance with the VOC content limitation for coatings shall be based upon the record keeping performed pursuant to 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 contents of the coatings. If, pursuant to Section 4.3 of 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 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.

b. VOC Emission Limitation: 21.0 lbs of VOC/day, for coatings only; 3.9 tons of VOC/year, for coatings and cleanup materials

Applicable Compliance Method: Compliance with the daily VOC emission rate has been determined by multiplying the maximum hourly coating usage rate, in pounds, by the maximum VOC content of the coating, in pounds/gallon, multiplied by 24 hrs/day. Compliance with the annual VOC emission limitation is ensured if compliance is maintained with the cleanup material usage limitation and VOC content limitations.
c. Material Usage Limitation: 2.5 gallons per month and 30 gallons per year, for cleanup materials

Applicable Compliance Method: Compliance with the monthly cleanup material usage limitation shall be determined by the record keeping performed pursuant to Section C.2. Compliance with the annual cleanup material usage limitation is ensured if compliance is maintained with the monthly material usage limitation.

F. **Miscellaneous Requirements**

1. None