Facility ID: 1431380503 Issuance type: Final State Permit To Operate

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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: 1431380503 Emissions Unit ID: P005 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
P005 - Coating pan for aqueous and solvent material w/ rotoclone (TT-28)	OAC rule 3745-31-05(A)(3) (PTI 14-05727)	Volatile Organic Compound (VOC) emissions from the process shall not exceed 88.0 lbs VOC/hour. VOC emissions from the process shall not exceed 40.0 tons per year (TPY), as a rolling 12-month summation, for P005 and P006 combined. Particulate emissions (PE) from the process shall not exceed 0.48 lb/hour and 2.12 TPY. Particulate matter emissions 10 microns and less in diameter (PM10) from the process shall not exceed 0.48 lb/hour and 2.12 TPY. The hourly VOC, PE, PM10 and annual emissions limitations for PE, PM10 are based upon the emissions unit's potential to emit. Therefore, no records are required to demonstrate compliance with these limits. Visible particulate emissions from any stack shall not exceed 10 percent opacity, as a six-minute average. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and 3745-31-05(C). See terms and conditions A.2.c. and A.2.d.
	OAC rule 3745-17-07(A)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(C)	See terms and condition A.2.b and B.1.

2. **Additional Terms and Conditions**

   (a) Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by emissions limitations, the use of a rotoclone to control particulate emissions and the limited solvent usage rate.
   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 B001, B003, P002-P008, P010, P012, P014, P015, P044-P048, P051, other de minimus air contaminant source, as defined in OAC rule 3745-15-05, and other air contaminant sources exempt from the requirement to obtain a permit-to-install pursuant to OAC rule 3745-31-03 installed subsequent to the issuance of this permit, combined, 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.
   Isopropyl alcohol emissions from emissions units P005 and P006 combined shall not exceed 88.0 lbs/hour.

Methyl alcohol emissions from emissions units P005 and P006 combined shall not exceed 60.0 lbs/hour.

B. **Operational Restrictions**

1. The volatile organic solvent usage rate shall not exceed 157,691 pounds per year, based on a rolling, 12-month summation for emissions units P005 and P006 combined. The volatile organic solvent usage rate, in pounds, equates to the assumption that 100% of the all the organic solvent is emitted.

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

1. The permittee shall collect and record the following information each month for emissions unit P005 and P006:

   a. the company identification of each coating/solvent and cleanup material employed in these emissions units;

   b. the amount of VOC materials employed, in pounds per month;

   c. the volatile organic compound emissions, in tons per month;

   d. the updated, rolling 12-month summation of the volatile organic solvent usage rate for P005 and P006, in pounds. This shall include the information for the current month and the preceding eleven months; and

   e. the updated, rolling 12-month summation of the VOC emissions for P005 and P006, in tons. This shall include the information for the current month and the preceding eleven months.

2. The permittee shall collect and record the following information each month for the emission units identified in term A.2.b:

   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 pound of coating or solvent, as applied;

   c. The total combined HAP content of each coating or solvent in pounds of combined HAPs per pound of coating or solvent, as applied [sum all the individual HAP contents from (b)];

   d. The number of pounds 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 calender months; and

   l. 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 calender 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.

3. The permittee shall collect and record the following information each day for emissions unit P005 and P006:

   a. the company identification of each coating and cleanup material employed that contains isopropyl alcohol and/or methyl alcohol in these emissions units;

   b. the amount of isopropyl alcohol and/or methyl alcohol materials employed, in pounds per day;

   c. the hours of operation during which isopropyl alcohol and/or methyl alcohol was employed in both P005 and P006; and

   d. the isopropyl alcohol and methyl alcohol emissions, in lbs/hr for emissions unit P005 and P006 combined (b/c).

D. **Reporting Requirements**

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any exceedance of the HAP emissions limitations outlined in term and condition A.2.b. 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.)

2. The permittee shall submit written reports to the Hamilton County Department of Environmental Services which

identify the amount of organic compounds (solvent) employed per month and the updated rolling, 12-month summation of the amount of volatile organic compounds employed for emissions units P005 and P006, combined. The reports shall also include the monthly VOC emissions rate and the updated rolling, 12-month VOC emissions rate. 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.)

3. The permittee shall submit written quarterly deviation reports to the Hamilton County Department of Environmental Services that include the following:

a. an identification of all hourly exceedances of the isopropyl alcohol and methyl alcohol emissions limitations.

If no exceedances occurred during the reporting period than a report is required stating so. 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.)

E. **Testing Requirements**

1. Emissions Limitations:
Volatile Organic Compound (VOC) emissions from the process shall not exceed 88.0 lbs VOC/hour.

VOC emissions from the process shall not exceed 40.0 tons per year (TPY), as a rolling 12-month summation, for P005 and P006 combined.

Applicable Compliance Method:
The hourly VOC emissions rate shall be determined by multiplying the maximum coating material throughput (pounds VOC per batch divided by the hours per batch) as provided in PTI application 14-05727 submitted on May 23, 2005. The annual VOC emissions shall be reported to the Hamilton County Department of Environmental Services and determined by summing the amount of VOC material employed per month over the preceding 12 month period and dividing by 2000 lbs/ton to obtain tons VOC per year.

2. Emissions Limitations:
Particulate emissions (PE) from the process shall not exceed 0.48 lb/hour and 2.12 TPY.

Particulate matter emissions 10 microns and less in diameter (PM10) from the process shall not exceed 0.48 lb/hour and 2.12 TPY.

Applicable Compliance Method:

PE and PM10 emissions rates shall be determined by multiplying the total coating material throughput (pounds per batch divided by the hours per batch) by the percent solids in the coating (25%), times the solids transfer factor of the tablet coating (1-0.67), times the particulate not controlled by the 95% efficient rotoclone (1- 0.95), as provided in PTI application 14-05727 submitted on May 23, 2005. The hourly coating material emissions shall be multiplied by 8760 hours per year and divided by 2000 lbs/ton to obtain the annual emissions.

3. Emissions Limitation:
Visible particulate emissions from any stack shall not exceed 10 percent opacity, as a 6-minute average.

Applicable Compliance Method:
Compliance with the visible particulate emission limitation shall be demonstrated by the methods outlined in 40 CFR Part 60, Appendix A, Method 9.

4. Compliance with the HAPs emissions limitations shall be based on the record keeping requirements established in term and condition C.2.

5. Compliance with the volatile organic material usage limitation in term and condition B.1 shall be demonstrated by the recordkeeping in term and condition C.1.

6. Compliance with the isopropyl alcohol and methyl alcohol emissions limitations of terms and conditions A.2.c and A.2.d shall be demonstrated by the record keeping in term and condition C.4.

7. Compliance with the limitation in term B.2 shall be demonstrated by the record keeping in term C.1.

F. **Miscellaneous Requirements**

1. The following terms and conditions in this permit are federally enforceable: Sections A, B, C, D and E.