

Facility ID: 1431391663 Issuance type: Title V Final Permit

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 III" and before "I. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

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## Part II - Specific Facility Terms and Conditions

### a State and Federally Enforceable Section

1. The following insignificant emissions units are located at this facility:

B001 5.2 MMBtu/hr natural gas and No. 2 oil-fired boiler;  
B002 5.2 MMBtu/hr natural gas and No. 2 oil-fired boiler;  
F001 roadways and parking areas;  
K005 steel ring dip tank;  
P001 drum blaster;  
P003 locking ring cleaner;  
P007 clean drum blaster; and  
P008 clean drum blaster.

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, and well as any emission limitations and/or control requirements contained within the identified permit to install for the emissions unit. Insignificant emissions units listed above that are not subject to specific permit to install requirements are subject to one or more applicable requirements contained in the SIP-approved versions of OAC Chapters 3745-17, 3745-18, and 3745-21.

(Authority for term: OAC rule 3745-77-07(A)(13))

2. The permittee is subject to the applicable limitations(s) and/or control measures, operational restrictions, monitoring and/or record keeping requirements, reporting requirements, testing requirements and the general and/or other requirements specified in 40 CFR Part 63, Subpart Mmmm - National Emission Standards for Hazardous Air Pollutants, Surface Coating of Miscellaneous Metal Parts and Products (including the Tables(s) and Appendix(ices) referenced in Subpart Mmmm, which are included in the text of Attachment 1 hereto, and are hereby incorporated into this permit as if fully rewritten.

Ordinarily, these requirements would be incorporated into Part II of this Title V Permit; however, incorporating Subpart Mmmm into Part II of this Title V permit was not practical due to technical incompatibilities and the limitations of the STARS program. In addition, numerous difficulties were encountered in attempting to copy and paste the Subpart's tables and/or equations into STARS format.

The following emissions units in this permit are be subject to the aforementioned requirements:

K001 open head steel drum exterior coating line;  
K002 closed head steel drum exterior coating line;  
K003 open head steel drum interior coating line;  
K004 open head steel drum interior coating line; and  
K005 steel ring dip tank.

(Authority for term: 40 CFR Part 63, Subpart Mmmm))

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### b State Only Enforceable Section

1. None

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- [Go to Part III for Emissions Unit K003](#)
- [Go to Part III for Emissions Unit K004](#)
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**Part III - Terms and Conditions for Emissions Units**

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Facility ID: 1431391663 Emissions Unit ID: K001 Issuance type: Title V Final Permit

**A. State and Federally Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

**I. 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>
open head steel drum exterior coating line with water wash	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a six-minute average, except as specified by rule.
	OAC rule 3745-17-11(B)(1) (Based on Table I)	0.551 lb/hour of particulate emissions (PE) from any stack associated with this emissions unit*
	OAC rule 3745-21-09(U)(1)(f)	*The hourly PE limitation is greater than the emissions unit's potential to emit. Therefore, it is not necessary to develop any additional monitoring, record keeping, or reporting requirements to ensure compliance with this emission limitation.  The VOC content (as applied) of each coating employed in this emissions unit shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents.

**2. Additional Terms and Conditions**

- (a) None

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**II. Operational Restrictions**

1. The permittee shall operate the waterwash system for particulate emission control whenever this emissions unit is in operation.

(Authority for term: OAC rule 3745-77-07(A)(1))

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

1. The permittee shall collect and record the following information each month for the line:
  - a. The name and identification number of each coating.
  - b. The VOC content of each coating (excluding water and exempt solvents), as applied.

(Authority for term: OAC rules 3745-21-09(B)(3)(f) and 3745-77-07(C)(1))

2. The permittee shall maintain daily records that document any time periods when the waterwash system was not in service when the emissions unit was in operation.

(Authority for term: OAC rule 3745-77-07(C)(1))

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IV. **Reporting Requirements**

1. The permittee shall notify the Hamilton County Department of Environmental Services 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 Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.

(Authority for term: OAC rules 3745-21-09(B)(3)(g) and 3745-77-07(C)(1))

2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing that the waterwash system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days after the event occurs.

(Authority for term: OAC rule 3745-77-07(C)(1))

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V. **Testing Requirements**

1. Compliance with the emission limitations in Section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Methods:

Compliance with the VOC content limitation may be demonstrated by the record keeping requirements specified in Section A.III.1.

USEPA Method 24 shall be used to determine the VOC content for coatings. If 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.

(Authority for term: OAC rules 3745-21-04(B)(5) and 3745-77-07(C)(1))

b. Emission Limitation:

0.551 lb PE/hr

Applicable Compliance Method:

To determine the actual worst case particulate emission rate, the following equation may be used for the paint spraying operations:

$$E = (\text{maximum coating solids usage rate in pounds per hour}) \times (1-TE) \times (1-CE)$$

where:

E = particulate emission rate (lbs/hr)

TE = transfer efficiency, expressed as a fraction (transfer efficiency is the percentage of total coating solids employed by a coating applicator which adheres to the object being coated; a default 60 percent transfer efficiency is acceptable for miscellaneous metal coating operations based on USEPA's "Blue Book" document entitled "Issues Relating to VOC Regulation Cutpoints, Deficiencies, and Deviations - Clarification to Appendix D of November 24, 1987 Federal Register," dated May 25, 1988, revised January 11, 1990)

CE = control efficiency of paint overspray control equipment for particulate matter, expressed as a fraction (98 percent is assumed for a waterwash system)

If required, compliance shall be determined through emission testing performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-5 and the procedures specified in OAC rule 3745-17-03(B)(10).

(Authority for term: OAC rules 3745-17-03(B)(10) and 3745-77-07(C)(1))

c. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity, as a six minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

(Authority for term: OAC rules 3745-17-03(B)(1) and 3745-77-07(C)(1))

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 1431391663 Emissions Unit ID: K001 Issuance type: Title V Final Permit

**B. State Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **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>
2. <b>Additional Terms and Conditions</b>			
1.	None		

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II. **Operational Restrictions**

1. None

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

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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**Part III - Terms and Conditions for Emissions Units**

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Facility ID: 1431391663 Emissions Unit ID: K002 Issuance type: Title V Final Permit

**A. State and Federally Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

**I. 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>
closed head steel drum exterior coating line with water wash	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a six-minute average, except as specified by rule.
	OAC rule 3745-17-11(B)(1) (Based on Table I)	0.551 lb/hour of particulate emissions (PE) from any stack associated with this emissions unit*
	OAC rule 3745-21-09(U)(1)(f)	*The hourly PE limitation is greater than the emissions unit's potential to emit. Therefore, it is not necessary to develop any additional monitoring, record keeping, or reporting requirements to ensure compliance with this emission limitation. The VOC content (as applied) of each coating employed in this emissions unit shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents.

**2. Additional Terms and Conditions**

- (a) None

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**II. Operational Restrictions**

1. The permittee shall operate the waterwash system for particulate emission control whenever this emissions unit is in operation.  
(Authority for term: OAC rule 3745-77-07(A)(1))

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

1. The permittee shall collect and record the following information each month for the line:
  - a. The name and identification number of each coating.
  - b. The VOC content of each coating (excluding water and exempt solvents), as applied.  
(Authority for term: OAC rules 3745-21-09(B)(3)(f) and 3745-77-07(C)(1))
2. The permittee shall maintain daily records that document any time periods when the waterwash system was not in service when the emissions unit was in operation.  
(Authority for term: OAC rule 3745-77-07(C)(1))

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IV. **Reporting Requirements**

1. The permittee shall notify the Hamilton County Department of Environmental Services 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 Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.

(Authority for term: OAC rules 3745-21-09(B)(3)(g) and 3745-77-07(C)(1))

2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing that the waterwash system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days after the event occurs.

(Authority for term: OAC rule 3745-77-07(C)(1))

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V. **Testing Requirements**

1. Compliance with the emission limitations in Section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Methods:

Compliance with the VOC content limitation may be demonstrated by the record keeping requirements specified in Section A.III.1.

USEPA Method 24 shall be used to determine the VOC content for coatings. If 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.

(Authority for term: OAC rules 3745-21-04(B)(5) and 3745-77-07(C)(1))

b. Emission Limitation:

0.551 lb PE/hr

Applicable Compliance Method:

To determine the actual worst case particulate emission rate, the following equation may be used for the paint spraying operations:

$$E = (\text{maximum coating solids usage rate in pounds per hour}) \times (1-TE) \times (1-CE)$$

where:

E = particulate emission rate (lbs/hr)

TE = transfer efficiency, expressed as a fraction (transfer efficiency is the percentage of total coating solids employed by a coating applicator which adheres to the object being coated; a default 60 percent transfer efficiency is acceptable for miscellaneous metal coating operations based on USEPA's "Blue Book" document entitled "Issues Relating to VOC Regulation Cutpoints, Deficiencies, and Deviations - Clarification to Appendix D of November 24, 1987 Federal Register," dated May 25, 1988, revised January 11, 1990)

CE = control efficiency of paint overspray control equipment for particulate matter, expressed as a fraction (98 percent is assumed for a waterwash system)

If required, compliance shall be determined through emission testing performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-5 and the procedures specified in OAC rule 3745-17-03(B)(10).

(Authority for term: OAC rules 3745-17-03(B)(10) and 3745-77-07(C)(1))

c. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity, as a six minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

(Authority for term: OAC rules 3745-17-03(B)(1) and 3745-77-07(C)(1))

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 1431391663 Emissions Unit ID: K002 Issuance type: Title V Final Permit

**B. State Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **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>
2. <b>Additional Terms and Conditions</b>			
1.	None		

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II. **Operational Restrictions**

1. None

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

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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**Part III - Terms and Conditions for Emissions Units**

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**Facility ID: 1431391663 Emissions Unit ID: K003 Issuance type: Title V Final Permit**

**A. State and Federally Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

**I. 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>
open head steel drum interior coating line with water wash	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a six-minute average, except as specified by rule.
	OAC rule 3745-17-11(B)(1) (Based on Table I)	0.551 lb/hour of particulate emissions (PE) from any stack associated with this emissions unit*
		*The hourly PE limitation is greater than the emissions unit's potential to emit. Therefore, it is not necessary to develop any additional monitoring, record keeping, or reporting requirements to ensure compliance with this emission limitation.
	OAC rule 3745-21-09(U)(1)(e)	The VOC content (as applied) of each coating employed in this emissions unit shall not exceed 4.3 pounds of VOC per gallon of coating, excluding water and exempt solvents.

**2. Additional Terms and Conditions**

- (a) None

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**II. Operational Restrictions**

- 1. The permittee shall operate the waterwash system for particulate emission control whenever this emissions unit is in operation.  
(Authority for term: OAC rule 3745-77-07(A)(1))

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

- 1. The permittee shall collect and record the following information each month for the line:
  - a. The name and identification number of each coating.
  - b. The VOC content of each coating (excluding water and exempt solvents), as applied.  
(Authority for term: OAC rules 3745-21-09(B)(3)(f) and 3745-77-07(C)(1))
- 2. The permittee shall maintain daily records that document any time periods when the waterwash system was not in service when the emissions unit was in operation.  
(Authority for term: OAC rule 3745-77-07(C)(1))

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**IV. Reporting Requirements**

- 1. The permittee shall notify the Hamilton County Department of Environmental Services 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 Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.

(Authority for term: OAC rules 3745-21-09(B)(3)(g) and 3745-77-07(C)(1))

2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing that the waterwash system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days after the event occurs.

(Authority for term: OAC rule 3745-77-07(C)(1))

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V. **Testing Requirements**

1. Compliance with the emission limitations in Section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

4.3 pounds of VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Methods:

Compliance with the VOC content limitation may be demonstrated by the record keeping requirements specified in Section A.III.1.

USEPA Method 24 shall be used to determine the VOC content for coatings. If 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.

(Authority for term: OAC rules 3745-21-04(B)(5) and 3745-77-07(C)(1))

b. Emission Limitation:

0.551 lb PE/hr

Applicable Compliance Method:

To determine the actual worst case particulate emission rate, the following equation may be used for the paint spraying operations:

$$E = (\text{maximum coating solids usage rate in pounds per hour}) \times (1-TE) \times (1-CE)$$

where:

E = particulate emission rate (lbs/hr)

TE = transfer efficiency, expressed as a fraction (transfer efficiency is the percentage of total coating solids employed by a coating applicator which adheres to the object being coated; a default 60 percent transfer efficiency is acceptable for miscellaneous metal coating operations based on USEPA's "Blue Book" document entitled "Issues Relating to VOC Regulation Cutpoints, Deficiencies, and Deviations - Clarification to Appendix D of November 24, 1987 Federal Register," dated May 25, 1988, revised January 11, 1990)

CE = control efficiency of paint overspray control equipment for particulate matter, expressed as a fraction (98 percent is assumed for a waterwash system)

If required, compliance shall be determined through emission testing performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-5 and the procedures specified in OAC rule 3745-17-03(B)(10).

(Authority for term: OAC rules 3745-17-03(B)(10) and 3745-77-07(C)(1))

c. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity, as a six minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

(Authority for term: OAC rules 3745-17-03(B)(1) and 3745-77-07(C)(1))

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 1431391663 Emissions Unit ID: K003 Issuance type: Title V Final Permit

**B. State Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **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>
2. <b>Additional Terms and Conditions</b>			
1.	None		

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II. **Operational Restrictions**

- 1. None

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

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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**Part III - Terms and Conditions for Emissions Units**

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Facility ID: 1431391663 Emissions Unit ID: K004 Issuance type: Title V Final Permit

**A. State and Federally Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

**I. 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>
open head steel drum interior coating line with water wash	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a six-minute average, except as specified by rule.
	OAC rule 3745-17-11(B)(1) (Based on Table I)	0.551 lb/hour of particulate emissions (PE) from any stack associated with this emissions unit*
	OAC rule 3745-21-09(U)(1)(e)	*The hourly PE limitation is greater than the emissions unit's potential to emit. Therefore, it is not necessary to develop any additional monitoring, record keeping, or reporting requirements to ensure compliance with this emission limitation.  The VOC content (as applied) of each coating employed in this emissions unit shall not exceed 4.3 pounds of VOC per gallon of coating, excluding water and exempt solvents.

**2. Additional Terms and Conditions**

- (a) None

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**II. Operational Restrictions**

1. The permittee shall operate the waterwash system for particulate emission control whenever this emissions unit is in operation.

(Authority for term: OAC rule 3745-77-07(A)(1))

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

1. The permittee shall collect and record the following information each month for the line:
  - a. The name and identification number of each coating.
  - b. The VOC content of each coating (excluding water and exempt solvents), as applied.

(Authority for term: OAC rules 3745-21-09(B)(3)(f) and 3745-77-07(C)(1))

2. The permittee shall maintain daily records that document any time periods when the waterwash system was not in service when the emissions unit was in operation.

(Authority for term: OAC rule 3745-77-07(C)(1))

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**IV. Reporting Requirements**

1. The permittee shall notify the Hamilton County Department of Environmental Services 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 Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.

(Authority for term: OAC rules 3745-21-09(B)(3)(g) and 3745-77-07(C)(1))

2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily

record showing that the waterwash system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days after the event occurs.

(Authority for term: OAC rule 3745-77-07(C)(1))

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V. **Testing Requirements**

1. Compliance with the emission limitations in Section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

4.3 pounds of VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Methods:

Compliance with the VOC content limitation may be demonstrated by the record keeping requirements specified in Section A.III.1.

USEPA Method 24 shall be used to determine the VOC content for coatings. If 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.

(Authority for term: OAC rules 3745-21-04(B)(5) and 3745-77-07(C)(1))

b. Emission Limitation:

0.551 lb PE/hr

Applicable Compliance Method:

To determine the actual worst case particulate emission rate, the following equation may be used for the paint spraying operations:

$$E = (\text{maximum coating solids usage rate in pounds per hour}) \times (1-TE) \times (1-CE)$$

where:

E = particulate emission rate (lbs/hr)

TE = transfer efficiency, expressed as a fraction (transfer efficiency is the percentage of total coating solids employed by a coating applicator which adheres to the object being coated; a default 60 percent transfer efficiency is acceptable for miscellaneous metal coating operations based on USEPA's "Blue Book" document entitled "Issues Relating to VOC Regulation Cutpoints, Deficiencies, and Deviations - Clarification to Appendix D of November 24, 1987 Federal Register," dated May 25, 1988, revised January 11, 1990)

CE = control efficiency of paint overspray control equipment for particulate matter, expressed as a fraction (98 percent is assumed for a waterwash system)

If required, compliance shall be determined through emission testing performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-5 and the procedures specified in OAC rule 3745-17-03(B)(10).

(Authority for term: OAC rules 3745-17-03(B)(10) and 3745-77-07(C)(1))

c. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity, as a six minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

(Authority for term: OAC rules 3745-17-03(B)(1) and 3745-77-07(C)(1))

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 1431391663 Emissions Unit ID: K004 Issuance type: Title V Final Permit

**B. State Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

**I. 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>
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**2. Additional Terms and Conditions**

- 1. None

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**II. Operational Restrictions**

- 1. None

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

- 1. None

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**IV. Reporting Requirements**

- 1. None

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**V. Testing Requirements**

- 1. None

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**VI. Miscellaneous Requirements**

- 1. None

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**Part III - Terms and Conditions for Emissions Units**

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Facility ID: 1431391663 Emissions Unit ID: N001 Issuance type: Title V Final Permit

**A. State and Federally Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

**I. 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>
drum reclamation incinerator with afterburner	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a six-minute average, except as specified by rule.
	OAC rule 3745-17-09(B)	Particulate emissions (PE) shall not exceed 0.10 pound per one hundred pounds of liquid, semi-solid or solid refuse and salvageable material charged to the incinerator.
	OAC rule 3745-17-09(C)	This emissions unit shall be designed, operated, and maintained so as to prevent the emission of objectionable odors.

**2. Additional Terms and Conditions**

- (a) None

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**II. Operational Restrictions**

1. The average combustion temperature within the afterburner, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

(Authority for term: OAC rule 3745-77-07(A)(1))

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

1. The permittee shall operate and maintain a continuous temperature monitor and recorder that measures and records the temperature within the afterburner when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information each day:

- a. The average temperature within the afterburner during each of the 8, 3-hour blocks of time during the day.
- b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

(Authority for term: OAC rule 3745-77-07(C)(1))

2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. The color of the emissions.
- b. Whether the emissions are representative of normal operations.
- c. If the emissions are not representative of normal operations, the cause of the abnormal emissions.
- d. The total duration of any visible emission incident.
- e. Any corrective actions taken to eliminate the visible emissions.

(Authority for term: OAC rule 3745-77-07(C)(1))

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**IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify all 3-hour blocks of time during which the average temperature within the afterburner did not comply with the temperature limitation specified in Section A.II.1.

The quarterly deviation (excursion) reports shall be submitted in accordance with Section A.1.c.ii of the General Terms and Conditions.

(Authority for term: OAC rule 3745-77-07(C)(1))

2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Hamilton County Department of Environmental Services by January 31 and July 31 of each year and shall cover the previous 6-month period.

(Authority for term: OAC rule 3745-77-07(C)(1))

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#### V. Testing Requirements

1. Compliance with the emission limitations in Section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

0.10 pound PE per one hundred pounds of liquid, semi-solid or solid refuse and salvageable material charged to the incinerator.

Applicable Compliance Method:

The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- i. The emission testing shall be conducted between years two and three after the effective date of this permit and within nine months prior to permit expiration;

- ii. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates specified in Section A.I.1.

- iii. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate: 40 CFR Part 60 Appendix A, Methods 1-5 and the procedures specified in OAC rule 3745-17-03(B)(8).

- iv. Concurrent visible emission observations shall be conducted during the emission testing in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

- v. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Hamilton County Department of Environmental Services.

- a. Not later than 30 days prior to the proposed test date, the permittee shall submit an "Intent to Test" notification to the Hamilton County Department of Environmental Services. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time and date of the test, and the person who will be conducting the test. Failure to submit such notification for review and approval prior to the test may result in the Hamilton County Department of Environmental Services's refusal to accept the results of the emission test.

Personnel from the Hamilton County Department of Environmental Services shall be permitted to witness the test, examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emission tests shall be signed by the person or persons responsible for the tests and submitted to the Hamilton County Department of Environmental Services within 30 days following completion of the test. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the the Hamilton County Department of Environmental Services.

(Authority for term: OAC rules 3745-17-03(B)(1), 3745-17-03(B)(8), and 3745-77-07(C)(1))

- b. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

(Authority for term: OAC rules 3745-17-03(B)(1) and 3745-77-07(C)(1))

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 1431391663 Emissions Unit ID: N001 Issuance type: Title V Final Permit

**B. State Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **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>
2. <b>Additional Terms and Conditions</b>			
1.	None		

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II. **Operational Restrictions**

- 1. None

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

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None