

**Synthetic Minor Determination and/or**  **Netting Determination**  
Permit To Install **14-05826**

**A. Source Description**

Three Bond applies coatings to nuts and bolts. All emissions are volatile organic compounds from evaporating solvents in the coatings and cleanup for these nuts and bolts.

**B. Facility Emissions and Attainment Status**

This facility is in Butler County, which is non-attainment for ozone and PM2.5. The facility until recently had combined and single hazardous air pollutants (HAPs) emissions above major source thresholds as well as volatile organic compound (VOC) emissions above the air permit to install (PTI) allowable for emissions units R001 through R009. They have managed to reduce HAPs emissions below major source thresholds but VOC emissions are still above existing permit allowable limits. This will be corrected with this PTI.

**C. Source Emissions**

In 2005, the facility single HAP emissions were as high as 13.5 tons per year (TPY) on a rolling 12-month basis for trichloroethylene (TCE) and as high as 12.6 TPY on a rolling 12-month basis for toluene. At the end of 2005, the facility combined HAP emissions were 20.74 TPY on a rolling 12-month basis. At the end of 2005, the facility single HAP emissions were reduced to 5.80 TPY for TCE on a rolling 12-month basis and 9.23 TPY for toluene.

Permit allowable VOC limits for emissions units R001 - R009 combined are 18.33 TPY. Three Bond has been above these limits for over a year and had annual emissions of 20.74 tons of VOC in 2005.

**D. Conclusion**

Three Bond was required to submit and did submit a Title V Operating Permit application because they had actual HAP emissions above major source HAPs thresholds. They were able to reduce HAPs emissions below major source thresholds and were allowed to withdraw the Title V application. They were above permit VOC emissions limits and remain above these limits. This PTI application will establish limits above their actual emissions and will enable them to return to compliance with all applicable regulations. The facility will be a synthetic minor to avoid 40 CFR Part 63, Subpart M, Title V permitting and non-attainment new source review for VOC based upon the limitations established in this permitting action.

**RE: DRAFT PERMIT TO INSTALL  
BUTLER COUNTY**

**CERTIFIED MAIL**

Street Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:  
Lazarus Gov.  
Center

**Application No:** 14-05826

**Fac ID:** 1409000654

**DATE:** 5/30/2006

Three Bond International Inc  
Annette Ehrhorn-Willeman  
6184 Schumacher Park Drive  
West Chester, OH 45069

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$2400** will be due. Please do not submit any payment now.

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. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,



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

CC: USEPA

HCDES

OH-KY-IN Regional Council of Governments

KY

IN

**BUTLER COUNTY**

**PUBLIC NOTICE**

**ISSUANCE OF DRAFT PERMIT TO INSTALL 14-05826 FOR AN AIR CONTAMINANT SOURCE FOR  
Three Bond International Inc**

On 5/30/2006 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Three Bond International Inc**, located at **6184 Schumacher Park Drive, West Chester, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 14-05826:

**Increase OC emissions limits for all existing sources, install a new coating machine and permit a coating process formerly believed exempt.**

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Brad Miller, Hamilton County Department of Environmental Services, 250 William Howart Taft Pkwy,  
Cincinnati, OH 45219-2660 [(513)946-7777]



**Permit To Install  
Terms and Conditions**

**Issue Date: To be entered upon final issuance  
Effective Date: To be entered upon final issuance**

**DRAFT PERMIT TO INSTALL 14-05826**

Application Number: 14-05826  
Facility ID: 1409000654  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: Three Bond International Inc  
Person to Contact: Annette Ehrhorn-Willeman  
Address: 6184 Schumacher Park Drive  
West Chester, OH 45069

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**6184 Schumacher Park Drive  
West Chester, Ohio**

Description of proposed emissions unit(s):  
**Increase OC emissions limits for all existing sources, install a new coating machine and permit a coating process formerly believed exempt.**

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

Director

## **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 quarterly, i.e., 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,

**Three Bond International Inc**

**Facility ID: 1409000654**

**PTI Application: 14-05826**

**Issued: To be entered upon final issuance**

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

**Three Bond International Inc**

**Facility ID: 1409000654**

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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**

**Three Bond International Inc**  
**PTI Application: 14-05826**  
**Issued: To be entered upon final issuance**

**Facility ID: 1409000654**

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>
VOC	44.01

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

1. 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R001 - Dip Coating Number 1	OAC rule 3745-31-05(A)(3)	Volatile Organic Compound (VOC) emissions shall not exceed 11.9 lbs/hour for coatings and cleanup material when coating miscellaneous metal parts.  The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2), OAC rule 3745-21-09(U)(2)(e)(ii) and OAC rule 3745-31-05(C).  See terms and conditions A.2.b, A.2.c, B.1, and B.2.
	OAC rule 3745-31-05(C) Synthetic Minor to avoid 40 CFR 63, Subpart M, Title V permitting and non-attainment new source review for VOC	See terms and conditions A.2.a and A.2.f.
	OAC rule 3745-21-09(U)(2)(e)(ii)	See term and condition B.3.
	OAC 3745-21-07(G)(2)	See term and condition B.4.

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**Three**

**PTI A**

**Issued: To be entered upon final issuance**

Emissions Unit ID: **R001**

**Issued: To be entered upon final issuance****2. Additional Terms and Conditions**

**2.a** The emissions of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from emissions units R001 (Dip Coating Number 1), R002 (Dip Coating Number 2), R003 (Dip Coating Number 3), R004 (Dip Coating Number 4), R005 (Dip Coating Number 5), R006 (Dip Coating Number 6), R008 (Rotary Coater Number 1), R009 (Rotary Coater Number 2), R010 (Automatic Coater Number 1), R011 (Automated Coater number 2), R012 (Automated Nut Coater) and R013 (Dip Coating associated with Tumbling) 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.

The permittee has existing records to demonstrate compliance with this limitation upon permit issuance.

**2.b** The volatile organic compound (VOC) content, as applied, for each coating employed in this emissions unit shall not exceed 6.39 pounds of VOC per gallon of coating.

**2.c** The VOC content of each cleanup material shall not exceed 7.61 pounds of VOC per gallon.

**2.d** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the VOC content limitations, usage limitations, and the emissions limitations.

**2.e** The lbs/hr VOC emissions limitation is based on the potential to emit of the emissions unit when coating miscellaneous metal parts. Therefore no hourly recordkeeping is required to determine compliance with this emissions limitation.

**2.f** The emissions of Volatile Organic Compound (VOC) from emissions units R001 (Dip Coating Number 1), R002 (Dip Coating Number 2), R003 (Dip Coating Number 3), R004 (Dip Coating Number 4), R005 (Dip Coating Number 5), R006 (Dip Coating Number 6), R008 (Rotary Coater Number 1), R009 (Rotary Coater Number 2), R010 (Automatic Coater Number 1), R011 (Automated Coater number 2), R012 (Automated Nut Coater) and R013 (Dip Coating associated with Tumbling) combined shall not exceed 44.01 TPY. Compliance with the above limitation shall be based on a rolling, 12 month-summation.

The permittee has existing records to demonstrate compliance with this limitation

**Three****PTI A**Emissions Unit ID: **R001****Issued: To be entered upon final issuance**

upon permit issuance.

**B. Operational Restrictions**

1. The maximum annual coating usage for emissions units R001-R006 and R008-R013 combined shall not exceed 6500 gallons per year with 20% waste recovery or 5200 gallons per year without waste recovery. Compliance with the above limitation shall be based on a rolling, 12 month-summation.
2. The maximum annual cleanup material usage for emissions units R001-R006 and R008-R013 combined shall not exceed 16,000 gallons per year with 55% waste recovery or 7200 gallons per year without waste recovery. Compliance with the above limitation shall be based on a rolling, 12 month-summation.
3. The maximum daily coating usage for this emissions unit shall not exceed 3 gallons, as applied, when coating miscellaneous metal parts.
4. On any day during which a non-metal part is coated in this emissions unit using photochemically reactive material as defined in OAC rule 3745-21-01(C)(5), Organic Compound emissions shall not exceed forty pounds in any one day nor eight pounds in any one hour.

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

1. On any day during which a non-metal part is coated in this emissions unit using photochemically reactive material as defined in OAC rule 3745-21-01(C)(5) the permittee shall collect and record the following information:
  - a. The name and identification number of each coating employed.
  - b. The volume, in gallons, of each coating employed.
  - c. The total volume, in gallons, of all coatings employed.
  - d. The Organic Compound (OC) content of each coating, in pounds per gallon, as applied.
  - e. The total OC emissions from coatings in pounds (b x d).
  - f. The name and identification number of each cleanup material employed.

Emissions Unit ID: **R001**

- g. The volume, in gallons, of each cleanup material employed.
  - h. The OC content of each cleanup material employed.
  - i. The total OC emissions from cleanup materials employed in pounds ( $g \times h$ ).
  - j. The total OC emissions from coatings and cleanup materials employed ( $e + i$ ).
  - k. The hours of operation of the emissions unit.
  - l. The hourly OC emission rate for all coating and cleanup materials ( $j$  divided by  $k$ ).
2. The permittee shall collect and record the following information each day for this emissions unit when coating miscellaneous metal parts:
    - a. The name and identification number of each coating employed.
    - b. The volume, in gallons, of each coating employed, as applied.
  3. This permittee shall collect and record the following information each month for the emissions units identified in term and condition A.2.f, combined:
    - a. The name and identification number of each coating employed.
    - b. The volume, in gallons, of each coating employed.
    - c. The total volume, in gallons, of all coatings employed.
    - d. The VOC content of each coating, in pounds per gallon, as applied.
    - e. The total VOC emissions from coatings in pounds per month ( $b \times d$ ).
    - f. The name and identification number of each cleanup material employed.
    - g. The volume, in gallons, of each cleanup material employed.
    - h. The VOC content of each cleanup material employed.
    - i. The total VOC emissions from cleanup materials employed in pounds per month ( $g \times h$ ).

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PTI A**Emissions Unit ID: **R001****Issued: To be entered upon final issuance**

- j. The total VOC emissions from coatings and cleanup materials employed per month (e + i).
  - k. The updated rolling twelve month total combined coatings and cleanup materials employed, in gallons.
  - l. The updated rolling twelve month total combined VOC emissions from all coatings and cleanup materials employed, in pounds or tons.
4. The permittee shall collect and record the following information each month for the emissions units identified in term and condition A.2.a:
  - a. The name and identification number of each coating used.
  - b. The individual Hazardous Air Pollutant (HAP) content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied.
  - c. The total combined HAP content of each coating in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (b)].
  - d. The number of gallons of each coating employed.
  - e. The name and identification of each organic cleanup material employed.
  - f. The individual HAP content for each HAP of each organic cleanup material in pounds of individual HAP per gallon of organic cleanup material, as applied.
  - g. The total combined HAP content of each organic cleanup material in pounds of combined HAPs per gallon of organic cleanup material, as applied [sum all the individual HAP contents from (f)].
  - h. The number of gallons of each organic cleanup material employed.
  - i. The total individual HAP emissions for each HAP from all coatings and organic cleanup materials employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each coating and the sum of (f) times (h) for each organic cleanup material].
  - j. The total combined HAP emissions from all coatings and organic cleanup materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each organic cleanup material].

- k. The updated rolling twelve month total of the total individual HAP emissions for each HAP from all coating and cleanup material employed, in pounds or tons.
- l. The updated rolling twelve month total of the total combined HAPs from all coating and cleanup material employed, in pounds or tons.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. This information does not have to be kept on a line-by-line basis.

- 5. The permit to install for this emissions was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

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

Pollutant: Toluene

TLV (ug/m<sup>3</sup>): 188,405

Maximum Hourly Emission Rate (lbs/hr): 2.9

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 338.0

MAGLC (ug/m<sup>3</sup>): 4486

Pollutant: Trichloroethylene

TLV (ug/m<sup>3</sup>): 268,712

Maximum Hourly Emission Rate (lbs/hr): 2.9

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 338.0

MAGLC (ug/m<sup>3</sup>): 6398

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 Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change.

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PTI A**Emissions Unit ID: **R001****Issued: To be entered upon final issuance**

Changes that can affect the parameters used in the "Air Toxic 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 Toxic Policy" 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 the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic 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 Toxic 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 Toxic Policy" for the change.

**D. Reporting Requirements**

Emissions Unit ID: **R001**

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., VOC contents). The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.
2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing the use of more than three gallons of coatings when coating miscellaneous metal parts. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.
3. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing an exceedance of eight pounds of OC emissions in any one hour or forty pounds in any one day when coating non-metal parts and using photochemically reactive material as defined in OAC rule 3745-21-01(C)(5). The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.
4. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month VOC emissions limitation set forth in term and condition A.2.f. or the coating or cleanup usage limitation in terms and conditions B.1. and B.2. The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous three calendar months (October through December, January through March, April through June and July through September, respectively.)

If no exceedances occurred, the permittee shall state so in the report.

5. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month HAP emissions limitations set forth in term A.2.a. The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous three calendar months (October through December, January through March, April through June and July through September, respectively.)

If no exceedances occurred, the permittee shall state so in the report.

6. The deviation reports shall be submitted in accordance with the reporting requirements of

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PTI A**Emissions Unit ID: **R001****Issued: To be entered upon final issuance**

the General Terms and Conditions of this permit unless otherwise specified.

**E. Testing Requirements**

1. Compliance with the emissions limitations in Section A. of these terms and conditions shall be determined in accordance with the following method(s):

Emissions Limitation:

11.9 lbs of VOC/hour from coatings and cleanup

Applicable Compliance Method:

The hourly VOC emissions limitation for coatings was determined by multiplying the maximum VOC content of applied coating and cleanup identified in term and condition A.2.b. and A.2.c. by the maximum hourly application rates identified in Permit To Install application 14-05826 [for coatings (6.39 lbs/gal)(0.38gal/hr), for cleanup (7.61 lbs/gal)(1.25 gal/hr)] and combining hourly coating and cleanup emissions. Record keeping is not required to determine compliance as the hourly emissions limitation is based on the emissions unit's maximum potential usage.

Emissions Limitation:

44.01 TPY of VOC, as a rolling, 12 month-summation, including coatings and cleanup materials

Applicable Compliance Method:

Compliance with the rolling, 12 month-summation VOC emissions limitation shall be determined by adding the annual emissions from coating and cleanup usage. Annual VOC emissions from coating shall be determined by multiplying the VOC content of applied coatings by the rolling, 12 month-summation of the usage. Annual VOC emissions from cleanup are determined by multiplying the VOC content of the cleanup by the rolling, 12 month-summation of the usage. The annual emissions from the coating and cleanup are then summed and divided by 2000 lb/ton to determine compliance with the annual emissions limitation on a rolling, 12 month-summation. Compliance shall be based upon the record keeping requirements as specified in term and condition C.3.

**Emissions Limitations:**

The total allowable emissions of Hazardous Air Pollutants (HAPs) from the emissions units identified in term and condition A.2.a. 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 HAPs emissions limitations shall be based on the record keeping requirements established in term and condition C.4.

2. USEPA methods 24 and 24A shall be used to determine the VOC content for coatings and cleanup materials. If, pursuant to Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A 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 precision statements for Method 24 or 24A.
3. Compliance with the operational restriction in term and condition B.1 shall be determined by the record keeping required in term and condition C.3.
4. Compliance with the operational restriction in term and condition B.2 shall be determined by the record keeping required in term and condition C.3.
5. Compliance with the operational restriction in term and condition B.3 shall be determined by the record keeping required in term and condition C.2.
6. Compliance with the operational restriction in term and condition B.4 shall be determined by the record keeping required in term and condition C.1.

**F. Miscellaneous Requirements**

1. The terms and conditions of this permit to install supersede the terms and conditions of Permit To Install 14-04664 issued on June 3, 1999.
2. The following terms and conditions of this permit to install shall be federally enforceable: A, B, C.1, through C.4, D, and E.

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PTI A

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Issued: To be entered upon final issuance

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

1. 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	OAC 3745-21-07(G)(2)
R002 - Dip Coating Number 2	OAC rule 3745-31-05(A)(3)	
	OAC rule 3745-31-05(C) Synthetic Minor to avoid 40 CFR 63, Subpart M, Title V permitting and non-attainment new source review for VOC	
	OAC rule 3745-21-09(U)(2)(e)(ii)	

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Applicable Emissions  
Limitations/Control Measures

Volatile Organic Compound (VOC) emissions shall not exceed 11.9 lbs/hour for coatings and cleanup material when coating miscellaneous metal parts.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2), OAC rule 3745-21-09(U)(2)(e)(ii) and OAC rule 3745-31-05(C).

See terms and conditions A.2.b, A.2.c, B.1, and B.2.

See terms and conditions A.2.a. and A.2.f.

See term and condition B.3.

See term and condition B.4.

## 2. Additional Terms and Conditions

**2.a** The emissions of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from emissions units R001 (Dip Coating Number 1), R002 (Dip Coating Number 2), R003 (Dip Coating Number 3), R004 (Dip Coating Number 4), R005 (Dip Coating Number 5), R006 (Dip Coating Number 6), R008 (Rotary Coater Number 1), R009 (Rotary Coater Number 2), R010 (Automatic Coater Number 1), R011 (Automated Coater number 2), R012 (Automated Nut Coater) and R013 (Dip Coating associated with Tumbling) 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.

The permittee has existing records to demonstrate compliance with this limitation upon permit issuance.

**2.b** The volatile organic compound (VOC) content, as applied, for each coating employed in this emissions unit shall not exceed 6.39 pounds of VOC per gallon of coating.

**2.c** The VOC content of each cleanup material shall not exceed 7.61 pounds of VOC per gallon.

**2.d** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the VOC content limitations, usage limitations, and the emissions limitations.

**2.e** The lbs/hr VOC emissions limitation is based on the potential to emit of the emissions unit when coating miscellaneous metal parts. Therefore no hourly recordkeeping is required to determine compliance with this emissions limitation.

**2.f** The emissions of Volatile Organic Compound (VOC) from emissions units R001 (Dip Coating Number 1), R002 (Dip Coating Number 2), R003 (Dip Coating Number 3), R004 (Dip Coating Number 4), R005 (Dip Coating Number 5), R006 (Dip Coating Number 6), R008 (Rotary Coater Number 1), R009 (Rotary Coater Number 2), R010 (Automatic Coater Number 1), R011 (Automated Coater number 2), R012 (Automated Nut Coater) and R013 (Dip Coating associated with Tumbling) combined shall not exceed 44.01 TPY. Compliance with the above limitation shall be based on a rolling, 12 month-summation.

The permittee has existing records to demonstrate compliance with this limitation upon permit issuance.

**Three****PTI A**Emissions Unit ID: **R002****Issued: To be entered upon final issuance****B. Operational Restrictions**

1. The maximum annual coating usage for emissions units R001-R006 and R008-R013 combined shall not exceed 6500 gallons per year with 20% waste recovery or 5200 gallons per year without waste recovery. Compliance with the above limitation shall be based on a rolling, 12 month-summation.
2. The maximum annual cleanup material usage for emissions units R001-R006 and R008-R013 combined shall not exceed 16,000 gallons per year with 55% waste recovery or 7200 gallons per year without waste recovery. Compliance with the above limitation shall be based on a rolling, 12 month-summation.
3. The maximum daily coating usage for this emissions unit shall not exceed 3 gallons, as applied, when coating miscellaneous metal parts.
4. On any day during which a non-metal part is coated in this emissions unit using photochemically reactive material as defined in OAC rule 3745-21-01(C)(5), Organic Compound emissions shall not exceed forty pounds in any one day nor eight pounds in any one hour.

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

1. On any day during which a non-metal part is coated in this emissions unit using photochemically reactive material as defined in OAC rule 3745-21-01(C)(5) the permittee shall collect and record the following information:
  - a. The name and identification number of each coating employed.
  - b. The volume, in gallons, of each coating employed.
  - c. The total volume, in gallons, of all coatings employed.
  - d. The Organic Compound (OC) content of each coating, in pounds per gallon, as applied.
  - e. The total OC emissions from coatings in pounds (b x d).
  - f. The name and identification number of each cleanup material employed.
  - g. The volume, in gallons, of each cleanup material employed.

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- h. The OC content of each cleanup material employed.
  - i. The total OC emissions from cleanup materials employed in pounds ( $g \times h$ ).
  - j. The total OC emissions from coatings and cleanup materials employed ( $e + i$ ).
  - k. The hours of operation of the emissions unit.
  - l. The hourly OC emission rate for all coating and cleanup materials ( $j$  divided by  $k$ ).
2. The permittee shall collect and record the following information each day for this emissions unit when coating miscellaneous metal parts:
- a. The name and identification number of each coating employed.
  - b. The volume, in gallons, of each coating employed, as applied.
3. This permittee shall collect and record the following information each month for the emissions units identified in term and condition A.2.f, combined:
- a. The name and identification number of each coating employed.
  - b. The volume, in gallons, of each coating employed.
  - c. The total volume, in gallons, of all coatings employed.
  - d. The VOC content of each coating, in pounds per gallon, as applied.
  - e. The total VOC emissions from coatings in pounds per month ( $b \times d$ ).
  - f. The name and identification number of each cleanup material employed.
  - g. The volume, in gallons, of each cleanup material employed.
  - h. The VOC content of each cleanup material employed.
  - i. The total VOC emissions from cleanup materials employed in pounds per month ( $g \times h$ ).

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- j. The total VOC emissions from coatings and cleanup materials employed per month (e + i).
  - k. The updated rolling twelve month total combined coatings and cleanup materials employed, in gallons.
  - l. The updated rolling twelve month total combined VOC emissions from all coatings and cleanup materials employed, in pounds or tons.
4. The permittee shall collect and record the following information each month for the emissions units identified in term and condition A.2.a:
- a. The name and identification number of each coating used.
  - b. The individual Hazardous Air Pollutant (HAP) content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied.
  - c. The total combined HAP content of each coating in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (b)].
  - d. The number of gallons of each coating employed.
  - e. The name and identification of each organic cleanup material employed.
  - f. The individual HAP content for each HAP of each organic cleanup material in pounds of individual HAP per gallon of organic cleanup material, as applied.
  - g. The total combined HAP content of each organic cleanup material in pounds of combined HAPs per gallon of organic cleanup material, as applied [sum all the individual HAP contents from (f)].
  - h. The number of gallons of each organic cleanup material employed.
  - i. The total individual HAP emissions for each HAP from all coatings and organic cleanup materials employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each coating and the sum of (f) times (h) for each organic cleanup material].
  - j. The total combined HAP emissions from all coatings and organic cleanup materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each organic cleanup material].

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- k. The updated rolling twelve month total of the total individual HAP emissions for each HAP from all coating and cleanup material employed, in pounds or tons.
- l. The updated rolling twelve month total of the total combined HAPs from all coating and cleanup material employed, in pounds or tons.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. This information does not have to be kept on a line-by-line basis.

- 5. The permit to install for this emissions was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

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

Pollutant: Toluene

TLV (ug/m3): 188,405

Maximum Hourly Emission Rate (lbs/hr): 2.9

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 338.0

MAGLC (ug/m3): 4486

Pollutant: Trichloroethylene

TLV (ug/m3): 268,712

Maximum Hourly Emission Rate (lbs/hr): 2.9

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 338.0

MAGLC (ug/m3): 6398

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 Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change.

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Changes that can affect the parameters used in the "Air Toxic 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 Toxic Policy" 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 the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic 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 Toxic 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 Toxic Policy" for the change.

## **D. Reporting Requirements**

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PTI A**Emissions Unit ID: **R002****Issued: To be entered upon final issuance**

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., VOC contents). The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.
2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing the use of more than three gallons of coatings when coating miscellaneous metal parts. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.
3. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing an exceedance of eight pounds of OC emissions in any one hour or forty pounds in any one day when coating non-metal parts and using photochemically reactive material as defined in OAC rule 3745-21-01(C)(5). The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.
4. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month VOC emissions limitation set forth in term and condition A.2.f. or the coating or cleanup usage limitation in terms and conditions B.1. and B.2. The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous three calendar months (October through December, January through March, April through June and July through September, respectively.)

If no exceedances occurred, the permittee shall state so in the report.

5. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month HAP emissions limitations set forth in term A.2.a. The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous three calendar months (October through December, January through March, April through June and July through September, respectively.)

If no exceedances occurred, the permittee shall state so in the report.

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6. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit unless otherwise specified.

#### E. Testing Requirements

1. Compliance with the emissions limitations in Section A. of these terms and conditions shall be determined in accordance with the following method(s):

Emissions Limitation:

11.9 lbs VOC/hour from coatings and cleanup

Applicable Compliance Method:

The hourly VOC emissions limitation for coatings was determined by multiplying the maximum VOC content of applied coating and cleanup identified in term and condition A.2.b. and A.2.c. by the maximum hourly application rates identified in Permit To Install application 14-05826 [for coatings (6.39 lbs/gal)(0.38gal/hr), for cleanup (7.61 lbs/gal)(1.25 gal/hr)] and combining hourly coating and cleanup emissions. Record keeping is not required to determine compliance as the hourly emissions limitation is based on the emissions unit's maximum potential usage.

Emissions Limitation:

44.01 TPY VOC, as a rolling, 12 month-summation, including coatings and cleanup materials

Applicable Compliance Method:

Compliance with the rolling, 12 month-summation VOC emissions limitation shall be determined by adding the annual emissions from coating and cleanup usage. Annual VOC emissions from coating shall be determined by multiplying the VOC content of applied coatings by the rolling, 12 month-summation of the usage. Annual VOC emissions from cleanup are determined by multiplying the VOC content of the cleanup by the rolling, 12 month-summation of the usage. The annual emissions from the coating and cleanup are then summed and divided by 2000 lb/ton to determine compliance with the annual emissions limitation on a rolling, 12 month-summation. Compliance shall be based upon the record keeping requirements as specified in term and condition C.3.

Emissions Limitations:

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

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PTI A**Emissions Unit ID: **R002****Issued: To be entered upon final issuance**

Applicable Compliance Method:

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

2. USEPA methods 24 and 24A shall be used to determine the VOC content for coatings and cleanup materials. If, pursuant to Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A 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 precision statements for Method 24 or 24A.
3. Compliance with the operational restriction in term and condition B.1. shall be determined by the record keeping required in term and condition C.3.
4. Compliance with the operational restriction in term and condition B.2. shall be determined by the record keeping required in term and condition C.3.
5. Compliance with the operational restriction in term and condition B.3. shall be determined by the record keeping required in term and condition C.2.
6. Compliance with the operational restriction in term and condition B.4. shall be determined by the record keeping required in term and condition C.1.

**F. Miscellaneous Requirements**

1. The terms and conditions of this permit to install supersede the terms and conditions of Permit To Install 14-04664 issued on June 3, 1999.
2. The following terms and conditions of this permit to install shall be federally enforceable: A, B, C.1 through C.4, D, and E.

**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R003 - Dip Coating Number 3	OAC rule 3745-31-05(A)(3)	Volatile Organic Compound (VOC) emissions shall not exceed 11.9 lbs/hour for coatings and cleanup material when coating miscellaneous metal parts.  The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2), OAC rule 3745-21-09(U)(2)(e)(ii) and OAC rule 3745-31-05(C).  See terms and conditions A.2.b, A.2.c, B.1, and B.2.
	OAC rule 3745-31-05(C) Synthetic Minor to avoid 40 CFR 63, Subpart M, Title V permitting and non-attainment new source review for VOC	See terms and conditions A.2.a and A.2.f.
	OAC rule 3745-21-09(U)(2)(e)(ii)	See term and condition B.3.
	OAC 3745-21-07(G)(2)	See term and condition B.4.

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**PTI A**

**Issued: To be entered upon final issuance**

Emissions Unit ID: **R003**

**Issued: To be entered upon final issuance****2. Additional Terms and Conditions**

**2.a** The emissions of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from emissions units R001 (Dip Coating Number 1), R002 (Dip Coating Number 2), R003 (Dip Coating Number 3), R004 (Dip Coating Number 4), R005 (Dip Coating Number 5), R006 (Dip Coating Number 6), R008 (Rotary Coater Number 1), R009 (Rotary Coater Number 2), R010 (Automatic Coater Number 1), R011 (Automated Coater number 2), R012 (Automated Nut Coater) and R013 (Dip Coating associated with Tumbling) 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.

The permittee has existing records to demonstrate compliance with this limitation upon permit issuance.

**2.b** The volatile organic compound (VOC) content, as applied, for each coating employed in this emissions unit shall not exceed 6.39 pounds of VOC per gallon of coating.

**2.c** The VOC content of each cleanup material shall not exceed 7.61 pounds of VOC per gallon.

**2.d** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the VOC content limitations, usage limitations, and the emissions limitations.

**2.e** The lbs/hr VOC emissions limitation is based on the potential to emit of the emissions unit when coating miscellaneous metal parts. Therefore no hourly recordkeeping is required to determine compliance with this emissions limitation.

**2.f** The emissions of Volatile Organic Compound (VOC) from emissions units R001 (Dip Coating Number 1), R002 (Dip Coating Number 2), R003 (Dip Coating Number 3), R004 (Dip Coating Number 4), R005 (Dip Coating Number 5), R006 (Dip Coating Number 6), R008 (Rotary Coater Number 1), R009 (Rotary Coater Number 2), R010 (Automatic Coater Number 1), R011 (Automated Coater number 2), R012 (Automated Nut Coater) and R013 (Dip Coating associated with Tumbling) combined shall not exceed 44.01 TPY. Compliance with the above limitation shall be based on a rolling, 12 month-summation.

The permittee has existing records to demonstrate compliance with this limitation

upon permit issuance.

## B. Operational Restrictions

1. The maximum annual coating usage for emissions units R001-R006 and R008-R013 combined shall not exceed 6500 gallons per year with 20% waste recovery or 5200 gallons per year without waste recovery. Compliance with the above limitation shall be based on a rolling, 12 month-summation.
2. The maximum annual cleanup material usage for emissions units R001-R006 and R008-R013 combined shall not exceed 16,000 gallons per year with 55% waste recovery or 7200 gallons per year without waste recovery. Compliance with the above limitation shall be based on a rolling, 12 month-summation.
3. The maximum daily coating usage for this emissions unit shall not exceed 3 gallons, as applied, when coating miscellaneous metal parts.
4. On any day during which a non-metal part is coated in this emissions unit using photochemically reactive material as defined in OAC rule 3745-21-01(C)(5), Organic Compound emissions shall not exceed forty pounds in any one day nor eight pounds in any one hour.

## C. Monitoring and/or Recordkeeping Requirements

1. On any day during which a non-metal part is coated in this emissions unit using photochemically reactive material as defined in OAC rule 3745-21-01(C)(5) the permittee shall collect and record the following information:
  - a. The name and identification number of each coating employed.
  - b. The volume, in gallons, of each coating employed.
  - c. The total volume, in gallons, of all coatings employed.
  - d. The Organic Compound (OC) content of each coating, in pounds per gallon, as applied.
  - e. The total OC emissions from coatings in pounds (b x d).
  - f. The name and identification number of each cleanup material employed.

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- g. The volume, in gallons, of each cleanup material employed.
  - h. The OC content of each cleanup material employed.
  - i. The total OC emissions from cleanup materials employed in pounds ( $g \times h$ ).
  - j. The total OC emissions from coatings and cleanup materials employed ( $e + i$ ).
  - k. The hours of operation of the emissions unit.
  - l. The hourly OC emission rate for all coating and cleanup materials ( $j$  divided by  $k$ ).
2. The permittee shall collect and record the following information each day for this emissions unit when coating miscellaneous metal parts:
  - a. The name and identification number of each coating employed.
  - b. The volume, in gallons, of each coating employed, as applied.
3. This permittee shall collect and record the following information each month for the emissions units identified in term and condition A.2.f, combined:
  - a. The name and identification number of each coating employed.
  - b. The volume, in gallons, of each coating employed.
  - c. The total volume, in gallons, of all coatings employed.
  - d. The VOC content of each coating, in pounds per gallon, as applied.
  - e. The total VOC emissions from coatings in pounds per month ( $b \times d$ ).
  - f. The name and identification number of each cleanup material employed.
  - g. The volume, in gallons, of each cleanup material employed.
  - h. The VOC content of each cleanup material employed.
  - i. The total VOC emissions from cleanup materials employed in pounds per month ( $g \times h$ ).

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- j. The total VOC emissions from coatings and cleanup materials employed per month (e + i).
  - k. The updated rolling twelve month total combined coatings and cleanup materials employed, in gallons.
  - l. The updated rolling twelve month total combined VOC emissions from all coatings and cleanup materials employed, in pounds or tons.
4. The permittee shall collect and record the following information each month for the emissions units identified in term and condition A.2.a:
- a. The name and identification number of each coating used.
  - b. The individual Hazardous Air Pollutant (HAP) content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied.
  - c. The total combined HAP content of each coating in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (b)].
  - d. The number of gallons of each coating employed.
  - e. The name and identification of each organic cleanup material employed.
  - f. The individual HAP content for each HAP of each organic cleanup material in pounds of individual HAP per gallon of organic cleanup material, as applied.
  - g. The total combined HAP content of each organic cleanup material in pounds of combined HAPs per gallon of organic cleanup material, as applied [sum all the individual HAP contents from (f)].
  - h. The number of gallons of each organic cleanup material employed.
  - i. The total individual HAP emissions for each HAP from all coatings and organic cleanup materials employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each coating and the sum of (f) times (h) for each organic cleanup material].
  - j. The total combined HAP emissions from all coatings and organic cleanup materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each organic cleanup material].

- k. The updated rolling twelve month total of the total individual HAP emissions for each HAP from all coating and cleanup material employed, in pounds or tons.
- l. The updated rolling twelve month total of the total combined HAPs from all coating and cleanup material employed, in pounds or tons.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. This information does not have to be kept on a line-by-line basis.

- 5. The permit to install for this emissions was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

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

Pollutant: Toluene

TLV (ug/m3): 188,405

Maximum Hourly Emission Rate (lbs/hr): 2.9

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 338.0

MAGLC (ug/m3): 4486

Pollutant: Trichloroethylene

TLV (ug/m3): 268,712

Maximum Hourly Emission Rate (lbs/hr): 2.9

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 338.0

MAGLC (ug/m3): 6398

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 Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change.

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Changes that can affect the parameters used in the "Air Toxic 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 Toxic Policy" 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 the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic 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 Toxic 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 Toxic Policy" for the change.

**D. Reporting Requirements**

Emissions Unit ID: R003

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., VOC contents). The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.
2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing the use of more than three gallons of coatings when coating miscellaneous metal parts. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.
3. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing an exceedance of eight pounds of OC emissions in any one hour or forty pounds in any one day when coating non-metal parts and using photochemically reactive material as defined in OAC rule 3745-21-01(C)(5). The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.
4. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month VOC emissions limitation set forth in term and condition A.2.f. or the coating or cleanup usage limitation in terms and conditions B.1. and B.2. The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous three calendar months (October through December, January through March, April through June and July through September, respectively.)

If no exceedances occurred, the permittee shall state so in the report.

5. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month HAP emissions limitations set forth in term A.2.a. The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous three calendar months (October through December, January through March, April through June and July through September, respectively.)

If no exceedances occurred, the permittee shall state so in the report.

6. The deviation reports shall be submitted in accordance with the reporting requirements of

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the General Terms and Conditions of this permit unless otherwise specified.

**E. Testing Requirements**

1. Compliance with the emissions limitations in Section A. of these terms and conditions shall be determined in accordance with the following method(s):

Emissions Limitation:

11.9 lbs of VOC/hour from coatings and cleanup.

Applicable Compliance Method:

The hourly VOC emissions limitation for coatings was determined by multiplying the maximum VOC content of applied coating and cleanup identified in term and condition A.2.b. and A.2.c. by the maximum hourly application rates identified in Permit To Install application 14-05826 [for coatings (6.39 lbs/gal)(0.38gal/hr), for cleanup (7.61 lbs/gal)(1.25 gal/hr)] and combining hourly coating and cleanup emissions. Record keeping is not required to determine compliance as the hourly emissions limitation is based on the emissions unit's maximum potential usage.

Emissions Limitation:

44.01 TPY of VOC, as a rolling, 12 month-summation, including coatings and cleanup materials.

Applicable Compliance Method:

Compliance with the rolling, 12 month-summation VOC emissions limitation shall be determined by adding the annual emissions from coating and cleanup usage. Annual VOC emissions from coating shall be determined by multiplying the VOC content of applied coatings by the rolling, 12 month-summation of the usage. Annual VOC emissions from cleanup are determined by multiplying the VOC content of the cleanup by the rolling, 12 month-summation of the usage. The annual emissions from the coating and cleanup are then summed and divided by 2000 lb/ton to determine compliance with the annual emissions limitation on a rolling, 12 month-summation. Compliance shall be based upon the record keeping requirements as specified in term and condition C.3.

Emissions Limitations:

The total allowable emissions of Hazardous Air Pollutants (HAPs) from the emissions

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units identified in term and condition A.2.a 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 HAPs emissions limitations shall be based on the record keeping requirements established in term and condition C.4.

2. USEPA methods 24 and 24A shall be used to determine the VOC content for coatings and cleanup materials. If, pursuant to Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A 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 precision statements for Method 24 or 24A.
3. Compliance with the operational restriction in term and condition B.1 shall be determined by the record keeping required in term and condition C.3.
4. Compliance with the operational restriction in term and condition B.2 shall be determined by the record keeping required in term and condition C.3.
5. Compliance with the operational restriction in term and condition B.3 shall be determined by the record keeping required in term and condition C.2.
6. Compliance with the operational restriction in term and condition B.4 shall be determined by the record keeping required in term and condition C.1.

## **F. Miscellaneous Requirements**

1. The terms and conditions of this permit to install supersede the terms and conditions of Permit To Install 14-04664 issued on June 3, 1999.
2. The following terms and conditions of this permit to install shall be federally enforceable: A, B, C.1 through C.4, D, and E.

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**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

1. 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	OAC 3745-21-07(G)(2)
R004 - Dip Coating Number 4	OAC rule 3745-31-05(A)(3)	
	OAC rule 3745-31-05(C) Synthetic Minor to avoid 40 CFR 63, Subpart M, Title V permitting and non-attainment new source review for VOC	
	OAC rule 3745-21-09(U)(2)(e)(ii)	

**Three Bond International Inc**  
**PTI Application: 14-05926**  
**Issue**

**Facility ID: 1409000654**

**Emissions Unit ID: R004**

Applicable Emissions  
Limitations/Control Measures

Volatile Organic Compound (VOC) emissions shall not exceed 11.9 lbs/hour for coatings and cleanup material when coating miscellaneous metal parts.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2), OAC rule 3745-21-09(U)(2)(e)(ii) and OAC rule 3745-31-05(C).

See terms and conditions A.2.b, A.2.c, B.1, and B.2.

See terms and conditions A.2.a and A.2.f.

See term and condition B.3.

See term and condition B.4.

**Three  
PTI A**Emissions Unit ID: **R004****Issued: To be entered upon final issuance****2. Additional Terms and Conditions**

**2.a** The emissions of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from emissions units R001 (Dip Coating Number 1), R002 (Dip Coating Number 2), R003 (Dip Coating Number 3), R004 (Dip Coating Number 4), R005 (Dip Coating Number 5), R006 (Dip Coating Number 6), R008 (Rotary Coater Number 1), R009 (Rotary Coater Number 2), R010 (Automatic Coater Number 1), R011 (Automated Coater number 2), R012 (Automated Nut Coater) and R013 (Dip Coating associated with Tumbling) 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.

The permittee has existing records to demonstrate compliance with this limitation upon permit issuance.

**2.b** The volatile organic compound (VOC) content, as applied, for each coating employed in this emissions unit shall not exceed 6.39 pounds of VOC per gallon of coating.

**2.c** The VOC content of each cleanup material shall not exceed 7.61 pounds of VOC per gallon.

**2.d** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the VOC content limitations, usage limitations, and the emissions limitations.

**2.e** The lbs/hr VOC emissions limitation is based on the potential to emit of the emissions unit when coating miscellaneous metal parts. Therefore no hourly recordkeeping is required to determine compliance with this emissions limitation.

**2.f** The emissions of Volatile Organic Compound (VOC) from emissions units R001 (Dip Coating Number 1), R002 (Dip Coating Number 2), R003 (Dip Coating Number 3), R004 (Dip Coating Number 4), R005 (Dip Coating Number 5), R006 (Dip Coating Number 6), R008 (Rotary Coater Number 1), R009 (Rotary Coater Number 2), R010 (Automatic Coater Number 1), R011 (Automated Coater number 2), R012 (Automated Nut Coater) and R013 (Dip Coating associated with Tumbling) combined shall not exceed 44.01 TPY. Compliance with the above limitation shall be based on a rolling, 12 month-summation.

The permittee has existing records to demonstrate compliance with this limitation

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upon permit issuance.

**B. Operational Restrictions**

1. The maximum annual coating usage for emissions units R001-R006 and R008-R013 combined shall not exceed 6500 gallons per year with 20% waste recovery or 5200 gallons per year without waste recovery. Compliance with the above limitation shall be based on a rolling, 12 month-summation.
2. The maximum annual cleanup material usage for emissions units R001-R006 and R008-R013 combined shall not exceed 16,000 gallons per year with 55% waste recovery or 7200 gallons per year without waste recovery. Compliance with the above limitation shall be based on a rolling, 12 month-summation.
3. The maximum daily coating usage for this emissions unit shall not exceed 3 gallons, as applied, when coating miscellaneous metal parts.
4. On any day during which a non-metal part is coated in this emissions unit using photochemically reactive material as defined in OAC rule 3745-21-01(C)(5), Organic Compound emissions shall not exceed forty pounds in any one day nor eight pounds in any one hour.

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

1. On any day during which a non-metal part is coated in this emissions unit using photochemically reactive material as defined in OAC rule 3745-21-01(C)(5) the permittee shall collect and record the following information:
  - a. The name and identification number of each coating employed.
  - b. The volume, in gallons, of each coating employed.
  - c. The total volume, in gallons, of all coatings employed.
  - d. The Organic Compound (OC) content of each coating, in pounds per gallon, as applied.
  - e. The total OC emissions from coatings in pounds (b x d).
  - f. The name and identification number of each cleanup material employed.

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- g. The volume, in gallons, of each cleanup material employed.
  - h. The OC content of each cleanup material employed.
  - i. The total OC emissions from cleanup materials employed in pounds ( $g \times h$ ).
  - j. The total OC emissions from coatings and cleanup materials employed ( $e + i$ ).
  - k. The hours of operation of the emissions unit.
  - l. The hourly OC emission rate for all coating and cleanup materials ( $j$  divided by  $k$ ).
2. The permittee shall collect and record the following information each day for this emissions unit when coating miscellaneous metal parts:
- a. The name and identification number of each coating employed.
  - b. The volume, in gallons, of each coating employed, as applied.
3. This permittee shall collect and record the following information each month for the emissions units identified in term and condition A.2.f, combined:
- a. The name and identification number of each coating employed.
  - b. The volume, in gallons, of each coating employed.
  - c. The total volume, in gallons, of all coatings employed.
  - d. The VOC content of each coating, in pounds per gallon, as applied.
  - e. The total VOC emissions from coatings in pounds per month ( $b \times d$ ).
  - f. The name and identification number of each cleanup material employed.
  - g. The volume, in gallons, of each cleanup material employed.
  - h. The VOC content of each cleanup material employed.
  - i. The total VOC emissions from cleanup materials employed in pounds per month ( $g \times h$ ).

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- j. The total VOC emissions from coatings and cleanup materials employed per month (e + i).
  - k. The updated rolling twelve month total combined coatings and cleanup materials employed, in gallons.
  - l. The updated rolling twelve month total combined VOC emissions from all coatings and cleanup materials employed, in pounds or tons.
4. The permittee shall collect and record the following information each month for the emissions units identified in term and condition A.2.a:
  - a. The name and identification number of each coating used.
  - b. The individual Hazardous Air Pollutant (HAP) content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied.
  - c. The total combined HAP content of each coating in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (b)].
  - d. The number of gallons of each coating employed.
  - e. The name and identification of each organic cleanup material employed.
  - f. The individual HAP content for each HAP of each organic cleanup material in pounds of individual HAP per gallon of organic cleanup material, as applied.
  - g. The total combined HAP content of each organic cleanup material in pounds of combined HAPs per gallon of organic cleanup material, as applied [sum all the individual HAP contents from (f)].
  - h. The number of gallons of each organic cleanup material employed.
  - i. The total individual HAP emissions for each HAP from all coatings and organic cleanup materials employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each coating and the sum of (f) times (h) for each organic cleanup material].
  - j. The total combined HAP emissions from all coatings and organic cleanup materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each organic cleanup material].

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- k. The updated rolling twelve month total of the total individual HAP emissions for each HAP from all coating and cleanup material employed, in pounds or tons.
- l. The updated rolling twelve month total of the total combined HAPs from all coating and cleanup material employed, in pounds or tons.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. This information does not have to be kept on a line-by-line basis.

- 5. The permit to install for this emissions was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

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

Pollutant: Toluene

TLV (ug/m3): 188,405

Maximum Hourly Emission Rate (lbs/hr): 2.9

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 338.0

MAGLC (ug/m3): 4486

Pollutant: Trichloroethylene

TLV (ug/m3): 268,712

Maximum Hourly Emission Rate (lbs/hr): 2.9

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 338.0

MAGLC (ug/m3): 6398

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 Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change.

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Changes that can affect the parameters used in the "Air Toxic 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 Toxic Policy" 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 the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic 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 Toxic 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 Toxic Policy" for the change.

## **D. Reporting Requirements**

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PTI A**Emissions Unit ID: **R004****Issued: To be entered upon final issuance**

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., VOC contents). The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.
2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing the use of more than three gallons of coatings when coating miscellaneous metal parts. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.
3. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing an exceedance of eight pounds of OC emissions in any one hour or forty pounds in any one day when coating non-metal parts and using photochemically reactive material as defined in OAC rule 3745-21-01(C)(5). The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.
4. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month VOC emissions limitation set forth in term and condition A.2.f. or the coating or cleanup usage limitation in terms and conditions B.1. and B.2. The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous three calendar months (October through December, January through March, April through June and July through September, respectively.)

If no exceedances occurred, the permittee shall state so in the report.

5. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month HAP emissions limitations set forth in term A.2.a. The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous three calendar months (October through December, January through March, April through June and July through September, respectively.)

If no exceedances occurred, the permittee shall state so in the report.

Emissions Unit ID: R004

6. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit unless otherwise specified.

#### E. Testing Requirements

1. Compliance with the emissions limitations in Section A. of these terms and conditions shall be determined in accordance with the following method(s):

Emissions Limitation:

11.9 lbs of VOC/hour from coatings and cleanup

Applicable Compliance Method:

The hourly VOC emissions limitation for coatings was determined by multiplying the maximum VOC content of applied coating and cleanup identified in term and condition A.2.b. and A.2.c. by the maximum hourly application rates identified in Permit To Install application 14-05826 [for coatings (6.39 lbs/gal)(0.38gal/hr), for cleanup (7.61 lbs/gal)(1.25 gal/hr)] and combining hourly coating and cleanup emissions. Record keeping is not required to determine compliance as the hourly emissions limitation is based on the emissions unit's maximum potential usage.

Emissions Limitation:

44.01 TPY of VOC, as a rolling, 12 month-summation, including coatings and cleanup materials

Applicable Compliance Method:

Compliance with the rolling, 12 month-summation VOC emissions limitation shall be determined by adding the annual emissions from coating and cleanup usage. Annual VOC emissions from coating shall be determined by multiplying the VOC content of applied coatings by the rolling, 12 month-summation of the usage. Annual VOC emissions from cleanup are determined by multiplying the VOC content of the cleanup by the rolling, 12 month-summation of the usage. The annual emissions from the coating and cleanup are then summed and divided by 2000 lb/ton to determine compliance with the annual emissions limitation on a rolling, 12 month-summation. Compliance shall be based upon the record keeping requirements as specified in term and condition C.3.

Emissions Limitations:

**Three Bond International Inc**  
**PTI Application: 14-05926**  
**Issue**

**Facility ID: 1409000654**

**Emissions Unit ID: R004**

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

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PTI A**Emissions Unit ID: **R004****Issued: To be entered upon final issuance**

## Applicable Compliance Method:

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

2. USEPA methods 24 and 24A shall be used to determine the VOC content for coatings and cleanup materials. If, pursuant to Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A 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 precision statements for Method 24 or 24A.
3. Compliance with the operational restriction in term and condition B.1 shall be determined by the record keeping required in term and condition C.3.
4. Compliance with the operational restriction in term and condition B.2 shall be determined by the record keeping required in term and condition C.3.
5. Compliance with the operational restriction in term and condition B.3 shall be determined by the record keeping required in term and condition C.2.
6. Compliance with the operational restriction in term and condition B.4 shall be determined by the record keeping required in term and condition C.1.

**F. Miscellaneous Requirements**

1. The terms and conditions of this permit to install supersede the terms and conditions of Permit To Install 14-04664 issued on June 3, 1999.
2. The following terms and conditions of this permit to install shall be federally enforceable: A, B, C.1 through C.4, D, and E.

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PTI A**

Emissions Unit ID: **R005**

**Issued: To be entered upon final issuance**

**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R005 - Dip Coating Number 5	OAC rule 3745-31-05(A)(3)	Volatile Organic Compound (VOC) emissions shall not exceed 11.9 lbs/hour for coatings and cleanup material when coating miscellaneous metal parts.
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2), OAC rule 3745-21-09(U)(2)(e)(ii) and OAC rule 3745-31-05(C).
		See terms and conditions A.2.b., A.2.c, B.1, and B.2.
	OAC rule 3745-31-05(C) Synthetic Minor to avoid 40 CFR 63, Subpart M, Title V permitting and non-attainment new source review for VOC	See terms and conditions A.2.a and A.2.f.
	OAC rule 3745-21-09(U)(2)(e)(ii)	See term and condition B.3.
	OAC 3745-21-07(G)(2)	See term and condition B.4.

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Emissions Unit ID: **R005**

**Issued: To be entered upon final issuance****2. Additional Terms and Conditions**

**2.a** The emissions of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from emissions units R001 (Dip Coating Number 1), R002 (Dip Coating Number 2), R003 (Dip Coating Number 3), R004 (Dip Coating Number 4), R005 (Dip Coating Number 5), R006 (Dip Coating Number 6), R008 (Rotary Coater Number 1), R009 (Rotary Coater Number 2), R010 (Automatic Coater Number 1), R011 (Automated Coater number 2), R012 (Automated Nut Coater) and R013 (Dip Coating associated with Tumbling) 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.

The permittee has existing records to demonstrate compliance with this limitation upon permit issuance.

**2.b** The volatile organic compound (VOC) content, as applied, for each coating employed in this emissions unit shall not exceed 6.39 pounds of VOC per gallon of coating.

**2.c** The VOC content of each cleanup material shall not exceed 7.61 pounds of VOC per gallon.

**2.d** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the VOC content limitations, usage limitations, and the emissions limitations.

**2.e** The lbs/hr VOC emissions limitation is based on the potential to emit of the emissions unit when coating miscellaneous metal parts. Therefore no hourly recordkeeping is required to determine compliance with this emissions limitation.

**2.f** The emissions of Volatile Organic Compound (VOC) from emissions units R001 (Dip Coating Number 1), R002 (Dip Coating Number 2), R003 (Dip Coating Number 3), R004 (Dip Coating Number 4), R005 (Dip Coating Number 5), R006 (Dip Coating Number 6), R008 (Rotary Coater Number 1), R009 (Rotary Coater Number 2), R010 (Automatic Coater Number 1), R011 (Automated Coater number 2), R012 (Automated Nut Coater) and R013 (Dip Coating associated with Tumbling) combined shall not exceed 44.01 TPY. Compliance with the above limitation shall be based on a rolling, 12 month-summation.

The permittee has existing records to demonstrate compliance with this limitation

upon permit issuance.

## B. Operational Restrictions

1. The maximum annual coating usage for emissions units R001-R006 and R008-R013 combined shall not exceed 6500 gallons per year with 20% waste recovery or 5200 gallons per year without waste recovery. Compliance with the above limitation shall be based on a rolling, 12 month-summation.
2. The maximum annual cleanup material usage for emissions units R001-R006 and R008-R013 combined shall not exceed 16,000 gallons per year with 55% waste recovery or 7200 gallons per year without waste recovery. Compliance with the above limitation shall be based on a rolling, 12 month-summation.
3. The maximum daily coating usage for this emissions unit shall not exceed 3 gallons, as applied, when coating miscellaneous metal parts.
4. On any day during which a non-metal part is coated in this emissions unit using photochemically reactive material as defined in OAC rule 3745-21-01(C)(5), Organic Compound emissions shall not exceed forty pounds in any one day nor eight pounds in any one hour.

## C. Monitoring and/or Recordkeeping Requirements

1. On any day during which a non-metal part is coated in this emissions unit using photochemically reactive material as defined in OAC rule 3745-21-01(C)(5) the permittee shall collect and record the following information:
  - a. The name and identification number of each coating employed.
  - b. The volume, in gallons, of each coating employed.
  - c. The total volume, in gallons, of all coatings employed.
  - d. The Organic Compound (OC) content of each coating, in pounds per gallon, as applied.
  - e. The total OC emissions from coatings in pounds (b x d).
  - f. The name and identification number of each cleanup material employed.

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- g. The volume, in gallons, of each cleanup material employed.
  - h. The OC content of each cleanup material employed.
  - i. The total OC emissions from cleanup materials employed in pounds ( $g \times h$ ).
  - j. The total OC emissions from coatings and cleanup materials employed ( $e + i$ ).
  - k. The hours of operation of the emissions unit.
  - l. The hourly OC emission rate for all coating and cleanup materials ( $j$  divided by  $k$ ).
2. The permittee shall collect and record the following information each day for this emissions unit when coating miscellaneous metal parts:
  - a. The name and identification number of each coating employed.
  - b. The volume, in gallons, of each coating employed, as applied.
3. This permittee shall collect and record the following information each month for the emissions units identified in term and condition A.2.f, combined:
  - a. The name and identification number of each coating employed.
  - b. The volume, in gallons, of each coating employed.
  - c. The total volume, in gallons, of all coatings employed.
  - d. The VOC content of each coating, in pounds per gallon, as applied.
  - e. The total VOC emissions from coatings in pounds per month ( $b \times d$ ).
  - f. The name and identification number of each cleanup material employed.
  - g. The volume, in gallons, of each cleanup material employed.
  - h. The VOC content of each cleanup material employed.
  - i. The total VOC emissions from cleanup materials employed in pounds per month ( $g \times h$ ).

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- j. The total VOC emissions from coatings and cleanup materials employed per month (e + i).
  - k. The updated rolling twelve month total combined coatings and cleanup materials employed, in gallons.
  - l. The updated rolling twelve month total combined VOC emissions from all coatings and cleanup materials employed, in pounds or tons.
4. The permittee shall collect and record the following information each month for the emissions units identified in term and condition A.2.a:
- a. The name and identification number of each coating used.
  - b. The individual Hazardous Air Pollutant (HAP) content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied.
  - c. The total combined HAP content of each coating in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (b)].
  - d. The number of gallons of each coating employed.
  - e. The name and identification of each organic cleanup material employed.
  - f. The individual HAP content for each HAP of each organic cleanup material in pounds of individual HAP per gallon of organic cleanup material, as applied.
  - g. The total combined HAP content of each organic cleanup material in pounds of combined HAPs per gallon of organic cleanup material, as applied [sum all the individual HAP contents from (f)].
  - h. The number of gallons of each organic cleanup material employed.
  - i. The total individual HAP emissions for each HAP from all coatings and organic cleanup materials employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each coating and the sum of (f) times (h) for each organic cleanup material].
  - j. The total combined HAP emissions from all coatings and organic cleanup materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each organic cleanup material].

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- k. The updated rolling twelve month total of the total individual HAP emissions for each HAP from all coating and cleanup material employed, in pounds or tons.
- l. The updated rolling twelve month total of the total combined HAPs from all coating and cleanup material employed, in pounds or tons.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. This information does not have to be kept on a line-by-line basis.

- 5. The permit to install for this emissions was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

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

Pollutant: Toluene

TLV (ug/m3): 188,405

Maximum Hourly Emission Rate (lbs/hr): 2.9

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 338.0

MAGLC (ug/m3): 4486

Pollutant: Trichloroethylene

TLV (ug/m3): 268,712

Maximum Hourly Emission Rate (lbs/hr): 2.9

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 338.0

MAGLC (ug/m3): 6398

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 Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change.

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Changes that can affect the parameters used in the "Air Toxic 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 Toxic Policy" 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 the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic 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 Toxic 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 Toxic Policy" for the change.

**D. Reporting Requirements**

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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., VOC contents). The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.
2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing the use of more than three gallons of coatings when coating miscellaneous metal parts. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.
3. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing an exceedance of eight pounds of OC emissions in any one hour or forty pounds in any one day when coating non-metal parts and using photochemically reactive material as defined in OAC rule 3745-21-01(C)(5). The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.
4. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month VOC emissions limitation set forth in term and condition A.2.f. or the coating or cleanup usage limitation in terms and conditions B.1. and B.2. The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous three calendar months (October through December, January through March, April through June and July through September, respectively.)

If no exceedances occurred, the permittee shall state so in the report.

5. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month HAP emissions limitations set forth in term A.2.a. The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous three calendar months (October through December, January through March, April through June and July through September, respectively.)

If no exceedances occurred, the permittee shall state so in the report.

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6. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit unless otherwise specified.

### E. Testing Requirements

1. Compliance with the emissions limitations in Section A. of these terms and conditions shall be determined in accordance with the following method(s):

Emissions Limitation:

11.9 lbs of VOC/hour from coatings and cleanup

Applicable Compliance Method:

The hourly VOC emissions limitation for coatings was determined by multiplying the maximum VOC content of applied coating and cleanup identified in term and condition A.2.b and A.2.c by the maximum hourly application rates identified in Permit To Install application 14-05826 [for coatings (6.39 lbs/gal)(0.38gal/hr), for cleanup (7.61 lbs/gal)(1.25 gal/hr)] and combining hourly coating and cleanup emissions. Record keeping is not required to determine compliance as the hourly emissions limitation is based on the emissions unit's maximum potential usage.

Emissions Limitation:

44.01 TPY of VOC, as a rolling, 12 month-summation, including coatings and cleanup materials

Applicable Compliance Method:

Compliance with the rolling, 12 month-summation VOC emissions limitation shall be determined by adding the annual emissions from coating and cleanup usage. Annual VOC emissions from coating shall be determined by multiplying the VOC content of applied coatings by the rolling, 12 month-summation of the usage. Annual VOC emissions from cleanup are determined by multiplying the VOC content of the cleanup by the rolling, 12 month-summation of the usage. The annual emissions from the coating and cleanup are then summed and divided by 2000 lb/ton to determine compliance with the annual emissions limitation on a rolling, 12 month-summation. Compliance shall be based upon the record keeping requirements as specified in term and condition C.3.

Emissions Limitations:

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The total allowable emissions of Hazardous Air Pollutants (HAPs) from the emissions units identified in term and condition A.2.a. 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 HAPs emissions limitations shall be based on the record keeping requirements established in term and condition C.4.

2. USEPA methods 24 and 24A shall be used to determine the VOC content for coatings and cleanup materials. If, pursuant to Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A 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 precision statements for Method 24 or 24A.
3. Compliance with the operational restriction in term and condition B.1 shall be determined by the record keeping required in term and condition C.3.
4. Compliance with the operational restriction in term and condition B.2 shall be determined by the record keeping required in term and condition C.3.
5. Compliance with the operational restriction in term and condition B.3 shall be determined by the record keeping required in term and condition C.2.
6. Compliance with the operational restriction in term and condition B.4 shall be determined by the record keeping required in term and condition C.1.

**F. Miscellaneous Requirements**

1. The terms and conditions of this permit to install supersede the terms and conditions of Permit To Install 14-04664 issued on June 3, 1999.
2. The following terms and conditions of this permit to install shall be federally enforceable: A., B., C.1 through C.4., D. and E.

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

1. 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R006 - Dip Coating Number 6	OAC rule 3745-31-05(A)(3)	Volatile Organic Compound (VOC) emissions shall not exceed 11.9 lbs/hour for coatings and cleanup material when coating miscellaneous metal parts.
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2), OAC rule 3745-21-09(U)(2)(e)(ii) and OAC rule 3745-31-05(C).
		See terms and conditions A.2.b, A.2.c, B.1, and B.2.
	OAC rule 3745-31-05(C) Synthetic Minor to avoid 40 CFR 63, Subpart M, Title V permitting and non-attainment new source review for VOC	See terms and conditions A.2.a. and A.2.f.
	OAC rule 3745-21-09(U)(2)(e)(ii)	See term and condition B.3.
	OAC 3745-21-07(G)(2)	See term and condition B.4.

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**Three Bond International Inc**  
**PTI Application: 14 05926**  
**Issue**

**Facility ID: 1409000654**

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**2. Additional Terms and Conditions**

**2.a** The emissions of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from emissions units R001 (Dip Coating Number 1), R002 (Dip Coating Number 2), R003 (Dip Coating Number 3), R004 (Dip Coating Number 4), R005 (Dip Coating Number 5), R006 (Dip Coating Number 6), R008 (Rotary Coater Number 1), R009 (Rotary Coater Number 2), R010 (Automatic Coater Number 1), R011 (Automated Coater number 2), R012 (Automated Nut Coater) and R013 (Dip Coating associated with Tumbling) 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.

The permittee has existing records to demonstrate compliance with this limitation upon permit issuance.

**2.b** The volatile organic compound (VOC) content, as applied, for each coating employed in this emissions unit shall not exceed 6.39 pounds of VOC per gallon of coating.

**2.c** The VOC content of each cleanup material shall not exceed 7.61 pounds of VOC per gallon.

**2.d** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the VOC content limitations, usage limitations, and the emissions limitations.

**2.e** The lbs/hr VOC emissions limitation is based on the potential to emit of the emissions unit when coating miscellaneous metal parts. Therefore no hourly recordkeeping is required to determine compliance with this emissions limitation.

**2.f** The emissions of Volatile Organic Compound (VOC) from emissions units R001 (Dip Coating Number 1), R002 (Dip Coating Number 2), R003 (Dip Coating Number 3), R004 (Dip Coating Number 4), R005 (Dip Coating Number 5), R006 (Dip Coating Number 6), R008 (Rotary Coater Number 1), R009 (Rotary Coater Number 2), R010 (Automatic Coater Number 1), R011 (Automated Coater number 2), R012 (Automated Nut Coater) and R013 (Dip Coating associated with Tumbling) combined shall not exceed 44.01 TPY. Compliance with the above limitation shall be based on a rolling, 12 month-summation.

The permittee has existing records to demonstrate compliance with this limitation

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upon permit issuance.

**B. Operational Restrictions**

1. The maximum annual coating usage for emissions units R001-R006 and R008-R013 combined shall not exceed 6500 gallons per year with 20% waste recovery or 5200 gallons per year without waste recovery. Compliance with the above limitation shall be based on a rolling, 12 month-summation.
2. The maximum annual cleanup material usage for emissions units R001-R006 and R008-R013 combined shall not exceed 16,000 gallons per year with 55% waste recovery or 7200 gallons per year without waste recovery. Compliance with the above limitation shall be based on a rolling, 12 month-summation.
3. The maximum daily coating usage for this emissions unit shall not exceed 3 gallons, as applied, when coating miscellaneous metal parts.
4. On any day during which a non-metal part is coated in this emissions unit using photochemically reactive material as defined in OAC rule 3745-21-01(C)(5), Organic Compound emissions shall not exceed forty pounds in any one day nor eight pounds in any one hour.

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

1. On any day during which a non-metal part is coated in this emissions unit using photochemically reactive material as defined in OAC rule 3745-21-01(C)(5) the permittee shall collect and record the following information:
  - a. The name and identification number of each coating employed.
  - b. The volume, in gallons, of each coating employed.
  - c. The total volume, in gallons, of all coatings employed.
  - d. The Organic Compound (OC) content of each coating, in pounds per gallon, as applied.
  - e. The total OC emissions from coatings in pounds (b x d).
  - f. The name and identification number of each cleanup material employed.

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- g. The volume, in gallons, of each cleanup material employed.
  - h. The OC content of each cleanup material employed.
  - i. The total OC emissions from cleanup materials employed in pounds ( $g \times h$ ).
  - j. The total OC emissions from coatings and cleanup materials employed ( $e + i$ ).
  - k. The hours of operation of the emissions unit.
  - l. The hourly OC emission rate for all coating and cleanup materials ( $j$  divided by  $k$ ).
2. The permittee shall collect and record the following information each day for this emissions unit when coating miscellaneous metal parts:
    - a. The name and identification number of each coating employed.
    - b. The volume, in gallons, of each coating employed, as applied.
3. This permittee shall collect and record the following information each month for the emissions units identified in term and condition A.2.f, combined:
    - a. The name and identification number of each coating employed.
    - b. The volume, in gallons, of each coating employed.
    - c. The total volume, in gallons, of all coatings employed.
    - d. The VOC content of each coating, in pounds per gallon, as applied.
    - e. The total VOC emissions from coatings in pounds per month ( $b \times d$ ).
    - f. The name and identification number of each cleanup material employed.
    - g. The volume, in gallons, of each cleanup material employed.
    - h. The VOC content of each cleanup material employed.
    - i. The total VOC emissions from cleanup materials employed in pounds per month ( $g \times h$ ).

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- j. The total VOC emissions from coatings and cleanup materials employed per month (e + i).
  - k. The updated rolling twelve month total combined coatings and cleanup materials employed, in gallons.
  - l. The updated rolling twelve month total combined VOC emissions from all coatings and cleanup materials employed, in pounds or tons.
4. The permittee shall collect and record the following information each month for the emissions units identified in term and condition A.2.a:
- a. The name and identification number of each coating used.
  - b. The individual Hazardous Air Pollutant (HAP) content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied.
  - c. The total combined HAP content of each coating in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (b)].
  - d. The number of gallons of each coating employed.
  - e. The name and identification of each organic cleanup material employed.
  - f. The individual HAP content for each HAP of each organic cleanup material in pounds of individual HAP per gallon of organic cleanup material, as applied.
  - g. The total combined HAP content of each organic cleanup material in pounds of combined HAPs per gallon of organic cleanup material, as applied [sum all the individual HAP contents from (f)].
  - h. The number of gallons of each organic cleanup material employed.
  - i. The total individual HAP emissions for each HAP from all coatings and organic cleanup materials employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each coating and the sum of (f) times (h) for each organic cleanup material].
  - j. The total combined HAP emissions from all coatings and organic cleanup materials employed, in pounds or tons per month [the sum of (c) times (d) for each

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coating plus the sum of (g) times (h) for each organic cleanup material].

- k. The updated rolling twelve month total of the total individual HAP emissions for each HAP from all coating and cleanup material employed, in pounds or tons.
- l. The updated rolling twelve month total of the total combined HAPs from all coating and cleanup material employed, in pounds or tons.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. This information does not have to be kept on a line-by-line basis.

- 5. The permit to install for this emissions was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

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

Pollutant: Toluene

TLV (ug/m<sup>3</sup>): 188,405

Maximum Hourly Emission Rate (lbs/hr): 2.9

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 338.0

MAGLC (ug/m<sup>3</sup>): 4486

Pollutant: Trichloroethylene

TLV (ug/m<sup>3</sup>): 268,712

Maximum Hourly Emission Rate (lbs/hr): 2.9

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 338.0

MAGLC (ug/m<sup>3</sup>): 6398

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 Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that

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the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic 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 Toxic Policy" 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 the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic 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 Toxic 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 Toxic 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., VOC contents). The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.
2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing the use of more than three gallons of coatings when coating miscellaneous metal parts. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.
3. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing an exceedance of eight pounds of OC emissions in any one hour or forty pounds in any one day when coating non-metal parts and using photochemically reactive material as defined in OAC rule 3745-21-01(C)(5). The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.
4. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month VOC emissions limitation set forth in term and condition A.2.f. or the coating or cleanup usage limitation in terms and conditions B.1. and B.2. The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous three calendar months (October through December, January through March, April through June and July through September, respectively.)  
  
If no exceedances occurred, the permittee shall state so in the report.
5. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month HAP emissions limitations set forth in term A.2.a. The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous three calendar months (October through December, January through March, April through June and July through September, respectively.)  
  
If no exceedances occurred, the permittee shall state so in the report.

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6. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit unless otherwise specified.

**E. Testing Requirements**

1. Compliance with the emissions limitations in Section A of these terms and conditions shall be determined in accordance with the following method(s):

Emissions Limitation:

11.9 lbs of VOC/hour from coatings and cleanup.

Applicable Compliance Method:

The hourly VOC emissions limitation for coatings was determined by multiplying the maximum VOC content of applied coating and cleanup identified in term and condition A.2.b and A.2.c by the maximum hourly application rates identified in Permit To Install application 14-05826 [for coatings (6.39 lbs/gal)(0.38gal/hr), for cleanup (7.61 lbs/gal)(1.25 gal/hr)] and combining hourly coating and cleanup emissions. Record keeping is not required to determine compliance as the hourly emissions limitation is based on the emissions unit's maximum potential usage.

Emissions Limitation:

44.01 TPY of VOC, as a rolling, 12 month-summation, including coatings and cleanup materials.

Applicable Compliance Method:

Compliance with the rolling, 12 month-summation VOC emissions limitation shall be determined by adding the annual emissions from coating and cleanup usage. Annual VOC emissions from coating shall be determined by multiplying the VOC content of applied coatings by the rolling, 12 month-summation of the usage. Annual VOC emissions from cleanup are determined by multiplying the VOC content of the cleanup by the rolling, 12 month-summation of the usage. The annual emissions from the coating and cleanup are then summed and divided by 2000 lb/ton to determine compliance with the annual emissions limitation on a rolling, 12 month-summation. Compliance shall be based upon the record keeping requirements as specified in term and condition C.3.

Emissions Limitations:

**Three Bond International Inc**  
**PTI Application: 14-05926**  
**Issue**

**Facility ID: 1409000654**

**Emissions Unit ID: R006**

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

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## Applicable Compliance Method:

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

2. USEPA methods 24 and 24A shall be used to determine the VOC content for coatings and cleanup materials. If, pursuant to Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A 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 precision statements for Method 24 or 24A.
3. Compliance with the operational restriction in term and condition B.1 shall be determined by the record keeping required in term and condition C.3.
4. Compliance with the operational restriction in term and condition B.2 shall be determined by the record keeping required in term and condition C.3.
5. Compliance with the operational restriction in term and condition B.3 shall be determined by the record keeping required in term and condition C.2.
6. Compliance with the operational restriction in term and condition B.4 shall be determined by the record keeping required in term and condition C.1.

**F. Miscellaneous Requirements**

1. The terms and conditions of this permit to install supersede the terms and conditions of Permit To Install 14-04664 issued on June 3, 1999.
2. The following terms and conditions of this permit to install shall be federally enforceable: A., B., C.1 through C.4., D. and E.

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PTI A

Emissions Unit ID: **R008**

Issued: To be entered upon final issuance

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

1. 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R008 - Rotary Coater Number 1	OAC rule 3745-31-05(A)(3)	Volatile Organic Compound (VOC) emissions shall not exceed 2.7 lbs/hour for coatings and cleanup material when coating miscellaneous metal parts.
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e)(ii) and OAC rule 3745-31-05(C).
		See terms and conditions A.2.b, A.2.c, B.1, and B.2.
	OAC rule 3745-31-05(C) Synthetic Minor to avoid 40 CFR 63, Subpart M, Title V permitting and non-attainment new source review for VOC	See terms and conditions A.2.a and A.2.f.
	OAC rule 3745-21-09(U)(2)(e)(ii)	See term and condition B.3.

**2. Additional Terms and Conditions**

- 2.a The emissions of Hazardous Air Pollutants (HAPs) as identified in Section 112(b)

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of Title III of the Clean Air Act from emissions units R001 (Dip Coating Number 1), R002 (Dip Coating Number 2), R003 (Dip Coating Number 3), R004 (Dip Coating Number 4), R005 (Dip Coating Number 5), R006 (Dip Coating Number 6), R008 (Rotary Coater Number 1), R009 (Rotary Coater Number 2), R010 (Automatic Coater Number 1), R011 (Automated Coater number 2), R012 (Automated Nut Coater) and R013 (Dip Coating associated with Tumbling) 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.

The permittee has existing records to demonstrate compliance with this limitation upon permit issuance.

- 2.b** The volatile organic compound (VOC) content, as applied, for each coating employed in this emissions unit shall not exceed 6.39 pounds of VOC per gallon of coating.
- 2.c** The VOC content of each cleanup material shall not exceed 7.61 pounds of VOC per gallon.
- 2.d** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the VOC content limitations, usage limitations, and the emissions limitations.
- 2.e** The lbs/hr VOC emissions limitation is based on the potential to emit of the emissions unit when coating miscellaneous metal parts. Therefore no hourly record keeping is required to determine compliance with this emissions limitation.
- 2.f** The emissions of Volatile Organic Compound (VOC) from emissions units R001 (Dip Coating Number 1), R002 (Dip Coating Number 2), R003 (Dip Coating Number 3), R004 (Dip Coating Number 4), R005 (Dip Coating Number 5), R006 (Dip Coating Number 6), R008 (Rotary Coater Number 1), R009 (Rotary Coater Number 2), R010 (Automatic Coater Number 1), R011 (Automated Coater number 2), R012 (Automated Nut Coater) and R013 (Dip Coating associated with Tumbling) combined shall not exceed 44.01 TPY. Compliance with the above limitation shall be based on a rolling, 12 month-summation.

The permittee has existing records to demonstrate compliance with this limitation upon permit issuance.

**B. Operational Restrictions**

Emissions Unit ID: **R008**

1. The maximum annual coating usage for emissions units R001-R006 and R008-R013 combined shall not exceed 6500 gallons per year with 20% waste recovery or 5200 gallons per year without waste recovery. Compliance with the above limitation shall be based on a rolling, 12 month-summation.
2. The maximum annual cleanup material usage for emissions units R001-R006 and R008-R013 combined shall not exceed 16,000 gallons per year with 55% waste recovery or 7200 gallons per year without waste recovery. Compliance with the above limitation shall be based on a rolling, 12 month-summation.
3. The maximum daily coating usage for this emissions unit shall not exceed 3 gallons, as applied, when coating miscellaneous metal parts.

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

1. The permittee shall collect and record the following information each day for this emissions unit when coating miscellaneous metal parts:
  - a. The name and identification number of each coating employed.
  - b. The volume, in gallons, of each coating employed, as applied.
2. This permittee shall collect and record the following information each month for the emissions units identified in term and condition A.2.f, combined:
  - a. The name and identification number of each coating employed.
  - b. The volume, in gallons, of each coating employed.
  - c. The total volume, in gallons, of all coatings employed.
  - d. The VOC content of each coating, in pounds per gallon, as applied.
  - e. The total VOC emissions from coatings in pounds per month (b x d).
  - f. The name and identification number of each cleanup material employed.
  - g. The volume, in gallons, of each cleanup material employed.
  - h. The VOC content of each cleanup material employed.

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- i. The total VOC emissions from cleanup materials employed in pounds per month (g x h).
  - j. The total VOC emissions from coatings and cleanup materials employed per month (e + i).
  - k. The updated rolling twelve month total combined coatings and cleanup materials employed, in gallons.
  - l. The updated rolling twelve month total combined VOC emissions from all coatings and cleanup materials employed, in pounds or tons.
3. The permittee shall collect and record the following information each month for the emissions units identified in term and condition A.2.a:
- a. The name and identification number of each coating used.
  - b. The individual Hazardous Air Pollutant (HAP) content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied.
  - c. The total combined HAP content of each coating in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (b)].
  - d. The number of gallons of each coating employed.
  - e. The name and identification of each organic cleanup material employed.
  - f. The individual HAP content for each HAP of each organic cleanup material in pounds of individual HAP per gallon of organic cleanup material, as applied.
  - g. The total combined HAP content of each organic cleanup material in pounds of combined HAPs per gallon of organic cleanup material, as applied [sum all the individual HAP contents from (f)].
  - h. The number of gallons of each organic cleanup material employed.
  - i. The total individual HAP emissions for each HAP from all coatings and organic cleanup materials employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each coating and the sum of (f) times (h) for each organic cleanup material].

Emissions Unit ID: **R008**

- j. The total combined HAP emissions from all coatings and organic cleanup materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each organic cleanup material].
- k. The updated rolling twelve month total of the total individual HAP emissions for each HAP from all coating and cleanup material employed, in pounds or tons.
- l. The updated rolling twelve month total of the total combined HAPs from all coating and cleanup material employed, in pounds or tons.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. This information does not have to be kept on a line-by-line basis.

- 4. The permit to install for this emissions was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

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

Pollutant: Toluene

TLV (ug/m3): 188,405

Maximum Hourly Emission Rate (lbs/hr): 2.9

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 338.0

MAGLC (ug/m3): 4486

Pollutant: Trichloroethylene

TLV (ug/m3): 268,712

Maximum Hourly Emission Rate (lbs/hr): 2.9

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 338.0

MAGLC (ug/m3): 6398

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

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impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic 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 Toxic Policy" 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 the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic 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 Toxic 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 Toxic 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., VOC contents). The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.
2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing the use of more than three gallons of coatings when coating miscellaneous metal parts. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.
3. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month VOC emissions limitation set forth in term and condition A.2.f. or the coating or cleanup usage limitation in terms and conditions B.1. and B.2. The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous three calendar months (October through December, January through March, April through June and July through September, respectively.)

If no exceedances occurred, the permittee shall state so in the report.

4. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month HAP emissions limitations set forth in term A.2.a. The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous three calendar months (October through December, January through March, April through June and July through September, respectively.)

If no exceedances occurred, the permittee shall state so in the report.

5. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit unless otherwise specified.

#### E. Testing Requirements

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PTI A**Emissions Unit ID: **R008****Issued: To be entered upon final issuance**

1. Compliance with the emissions limitations in Section A of these terms and conditions shall be determined in accordance with the following method(s):

## Emissions Limitation:

2.7 lbs VOC/hour from coatings and cleanup materials.

## Applicable Compliance Method:

The hourly VOC emissions limitation for coatings was determined by multiplying the maximum VOC content of applied coating and cleanup identified in term and condition A.2.b and A.2.c by the maximum hourly application rates identified in Permit To Install application 14-05826 [for coatings (6.39 lbs/gal)(0.38gal/hr), for cleanup (7.61 lbs/gal)(0.03 gal/hr)] and combining hourly coating and cleanup emissions.

## Emissions Limitation:

44.01 TPY VOC, as a rolling, 12 month-summation, including coatings and cleanup materials.

## Applicable Compliance Method:

Compliance with the rolling, 12 month-summation VOC emissions limitation shall be determined by adding the annual emissions from coating and cleanup usage. Annual VOC emissions from coating shall be determined by multiplying the VOC content of applied coatings by the rolling, 12 month-summation of the usage. Annual VOC emissions from cleanup are determined by multiplying the VOC content of the cleanup by the rolling, 12 month-summation of the usage. The annual emissions from the coating and cleanup are then summed and divided by 2000 lb/ton to determine compliance with the annual emissions limitation on a rolling, 12 month-summation. Compliance shall be based upon the record keeping requirements as specified in term and condition C.2.

## Emissions Limitations:

The total allowable emissions of Hazardous Air Pollutants (HAPs) from the emissions units identified in term and condition A.2.a. 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 HAPs emissions limitations shall be based on the record keeping requirements established in term and condition C.3.

2. USEPA methods 24 and 24A shall be used to determine the VOC content for coatings and cleanup materials. If, pursuant to Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A 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 precision statements for Method 24 or 24A.
3. Compliance with the operational restriction in term and condition B.1 shall be determined by the record keeping required in term and condition C.2.
4. Compliance with the operational restriction in term and condition B.2 shall be determined by the record keeping required in term and condition C.2.
5. Compliance with the operational restriction in term and condition B.3 shall be determined by the record keeping required in term and condition C.1.

**F. Miscellaneous Requirements**

1. The terms and conditions of this permit to install supersede the terms and conditions of Permit To Install 14-04664 issued on June 3, 1999.
2. The following terms and conditions of this permit to install shall be federally enforceable: A, B, C.1 through C.3, D, and E.

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Emissions Unit ID: **R009**

Issued: To be entered upon final issuance

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

1. 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R009 - Rotary Coater Number 2	OAC rule 3745-31-05(A)(3)	Volatile Organic Compound (VOC) emissions shall not exceed 2.7 lbs/hour for coatings and cleanup material when coating miscellaneous metal parts.
	OAC rule 3745-31-05(C) Synthetic Minor to avoid 40 CFR 63, Subpart M, Title V permitting and non-attainment new source review for VOC	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e)(ii) and OAC rule 3745-31-05(C).  See terms and conditions A.2.b, A.2.c, B.1, and B.2.
	OAC rule 3745-21-09(U)(2)(e)(ii)	See terms and conditions A.2.a and A.2.f.  See term and condition B.3.

**2. Additional Terms and Conditions**

- 2.a The emissions of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from emissions units R001 (Dip Coating Number 1),

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R002 (Dip Coating Number 2), R003 (Dip Coating Number 3), R004 (Dip Coating Number 4), R005 (Dip Coating Number 5), R006 (Dip Coating Number 6), R008 (Rotary Coater Number 1), R009 (Rotary Coater Number 2), R010 (Automatic Coater Number 1), R011 (Automated Coater number 2), R012 (Automated Nut Coater) and R013 (Dip Coating associated with Tumbling) 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.

The permittee has existing records to demonstrate compliance with this limitation upon permit issuance.

- 2.b** The volatile organic compound (VOC) content, as applied, for each coating employed in this emissions unit shall not exceed 6.39 pounds of VOC per gallon of coating.
- 2.c** The VOC content of each cleanup material shall not exceed 7.61 pounds of VOC per gallon.
- 2.d** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the VOC content limitations, usage limitations, and the emissions limitations.
- 2.e** The lbs/hr VOC emissions limitation is based on the potential to emit of the emissions unit when coating miscellaneous metal parts. Therefore no hourly record keeping is required to determine compliance with this emissions limitation.
- 2.f** The emissions of Volatile Organic Compound (VOC) from emissions units R001 (Dip Coating Number 1), R002 (Dip Coating Number 2), R003 (Dip Coating Number 3), R004 (Dip Coating Number 4), R005 (Dip Coating Number 5), R006 (Dip Coating Number 6), R008 (Rotary Coater Number 1), R009 (Rotary Coater Number 2), R010 (Automatic Coater Number 1), R011 (Automated Coater number 2), R012 (Automated Nut Coater) and R013 (Dip Coating associated with Tumbling) combined shall not exceed 44.01 TPY. Compliance with the above limitation shall be based on a rolling, 12 month-summation.

The permittee has existing records to demonstrate compliance with this limitation upon permit issuance.

**B. Operational Restrictions**

1. The maximum annual coating usage for emissions units R001-R006 and R008-R013

Emissions Unit ID: **R009**

combined shall not exceed 6500 gallons per year with 20% waste recovery or 5200 gallons per year without waste recovery. Compliance with the above limitation shall be based on a rolling, 12 month-summation.

2. The maximum annual cleanup material usage for emissions units R001-R006 and R008-R013 combined shall not exceed 16,000 gallons per year with 55% waste recovery or 7200 gallons per year without waste recovery. Compliance with the above limitation shall be based on a rolling, 12 month-summation.
3. The maximum daily coating usage for this emissions unit shall not exceed 3 gallons, as applied, when coating miscellaneous metal parts.

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

1. The permittee shall collect and record the following information each day for this emissions unit when coating miscellaneous metal parts:
  - a. The name and identification number of each coating employed.
  - b. The volume, in gallons, of each coating employed, as applied.
2. This permittee shall collect and record the following information each month for the emissions units identified in term and condition A.2.f, combined:
  - a. The name and identification number of each coating employed.
  - b. The volume, in gallons, of each coating employed.
  - c. The total volume, in gallons, of all coatings employed.
  - d. The VOC content of each coating, in pounds per gallon, as applied.
  - e. The total VOC emissions from coatings in pounds per month (b x d).
  - f. The name and identification number of each cleanup material employed.
  - g. The volume, in gallons, of each cleanup material employed.
  - h. The VOC content of each cleanup material employed.
  - i. The total VOC emissions from cleanup materials employed in pounds per month

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(g x h).

- j. The total VOC emissions from coatings and cleanup materials employed per month (e + i).
  - k. The updated rolling twelve month total combined coatings and cleanup materials employed, in gallons.
  - l. The updated rolling twelve month total combined VOC emissions from all coatings and cleanup materials employed, in pounds or tons.
3. The permittee shall collect and record the following information each month for the emissions units identified in term and condition A.2.a:
- a. The name and identification number of each coating used.
  - b. The individual Hazardous Air Pollutant (HAP) content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied.
  - c. The total combined HAP content of each coating in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (b)].
  - d. The number of gallons of each coating employed.
  - e. The name and identification of each organic cleanup material employed.
  - f. The individual HAP content for each HAP of each organic cleanup material in pounds of individual HAP per gallon of organic cleanup material, as applied.
  - g. The total combined HAP content of each organic cleanup material in pounds of combined HAPs per gallon of organic cleanup material, as applied [sum all the individual HAP contents from (f)].
  - h. The number of gallons of each organic cleanup material employed.
  - i. The total individual HAP emissions for each HAP from all coatings and organic cleanup materials employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each coating and the sum of (f) times (h) for each organic cleanup material].
  - j. The total combined HAP emissions from all coatings and organic cleanup

Emissions Unit ID: **R009**

materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each organic cleanup material].

- k. The updated rolling twelve month total of the total individual HAP emissions for each HAP from all coating and cleanup material employed, in pounds or tons.
- l. The updated rolling twelve month total of the total combined HAPs from all coating and cleanup material employed, in pounds or tons.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. This information does not have to be kept on a line-by-line basis.

- 4. The permit to install for this emissions was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

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

Pollutant: Toluene

TLV (ug/m3): 188,405

Maximum Hourly Emission Rate (lbs/hr): 2.9

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 338.0

MAGLC (ug/m3): 4486

Pollutant: Trichloroethylene

TLV (ug/m3): 268,712

Maximum Hourly Emission Rate (lbs/hr): 2.9

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 338.0

MAGLC (ug/m3): 6398

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

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"Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic 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 Toxic Policy" 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 the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic 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 Toxic 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 Toxic 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., VOC contents). The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.
2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing the use of more than three gallons of coatings when coating miscellaneous metal parts. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.
3. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month VOC emissions limitation set forth in term and condition A.2.f. or the coating or cleanup usage limitation in terms and conditions B.1. and B.2. The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous three calendar months (October through December, January through March, April through June and July through September, respectively.)

If no exceedances occurred, the permittee shall state so in the report.

4. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month HAP emissions limitations set forth in term A.2.a. The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous three calendar months (October through December, January through March, April through June and July through September, respectively.)

If no exceedances occurred, the permittee shall state so in the report.

5. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit unless otherwise specified.

#### E. Testing Requirements

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1. Compliance with the emissions limitations in Section A. of these terms and conditions shall be determined in accordance with the following method(s):

Emissions Limitation:

2.7 lbs of VOC/hour from coatings and cleanup.

Applicable Compliance Method:

The hourly VOC emissions limitation for coatings was determined by multiplying the maximum VOC content of applied coating and cleanup identified in term and condition A.2.b. and A.2.c. by the maximum hourly application rates identified in Permit To Install application 14-05826 [for coatings (6.39 lbs/gal)(0.38gal/hr), for cleanup (7.61 lbs/gal)(0.03 gal/hr)] and combining hourly coating and cleanup emissions.

Emissions Limitation:

44.01 TPY of VOC, as a rolling, 12 month-summation, including coatings and cleanup materials.

Applicable Compliance Method:

Compliance with the rolling, 12 month-summation VOC emissions limitation shall be determined by adding the annual emissions from coating and cleanup usage. Annual VOC emissions from coating shall be determined by multiplying the VOC content of applied coatings by the rolling, 12 month-summation of the usage. Annual VOC emissions from cleanup are determined by multiplying the VOC content of the cleanup by the rolling, 12 month-summation of the usage. The annual emissions from the coating and cleanup are then summed and divided by 2000 lb/ton to determine compliance with the annual emissions limitation on a rolling, 12 month-summation. Compliance shall be based upon the record keeping requirements as specified in term and condition C.2.

Emissions Limitations:

The total allowable emissions of Hazardous Air Pollutants (HAPs) from the emissions units identified in term and condition A.2.a. 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 HAPs emissions limitations shall be based on the record keeping requirements established in term and condition C.3.

2. USEPA methods 24 and 24A shall be used to determine the VOC content for coatings and cleanup materials. If, pursuant to Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A 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 precision statements for Method 24 or 24A.
3. Compliance with the operational restriction in term and condition B.1 shall be determined by the record keeping required in term and condition C.2.
4. Compliance with the operational restriction in term and condition B.2 shall be determined by the record keeping required in term and condition C.2.
5. Compliance with the operational restriction in term and condition B.3 shall be determined by the record keeping required in term and condition C.1.

**F. Miscellaneous Requirements**

1. The terms and conditions of this permit to install supersede the terms and conditions of Permit To Install 14-04664 issued on June 3, 1999.
2. The following terms and conditions of this permit to install shall be federally enforceable: A, B, C.1 through C.3, D, and E.

**Three****PTI A**Emissions Unit ID: **R010****Issued: To be entered upon final issuance****PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. Applicable Emissions Limitations and/or Control Requirements**

1. 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R010 - Automated Coater Number 1	OAC rule 3745-31-05(A)(3)	<p>Volatile Organic Compound (VOC) emissions shall not exceed 2.7 lbs/hour for coatings and cleanup material when coating miscellaneous metal parts.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e)(ii) and OAC rule 3745-31-05(C).</p> <p>See terms and conditions A.2.b, A.2.c, B.1, and B.2.</p>
	OAC rule 3745-31-05(C) Synthetic Minor to avoid 40 CFR 63, Subpart Mmmm, Title V permitting and non-attainment new source review for VOC	See terms and conditions A.2.a and A.2.f.
	OAC rule 3745-21-09(U)(2)(e)(ii)	See term and condition B.3.

**2. Additional Terms and Conditions**

- 2.a The emissions of Hazardous Air Pollutants (HAPs) as identified in Section 112(b)

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of Title III of the Clean Air Act from emissions units R001 (Dip Coating Number 1), R002 (Dip Coating Number 2), R003 (Dip Coating Number 3), R004 (Dip Coating Number 4), R005 (Dip Coating Number 5), R006 (Dip Coating Number 6), R008 (Rotary Coater Number 1), R009 (Rotary Coater Number 2), R010 (Automatic Coater Number 1), R011 (Automated Coater number 2), R012 (Automated Nut Coater) and R013 (Dip Coating associated with Tumbling) 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.

The permittee has existing records to demonstrate compliance with this limitation upon permit issuance.

- 2.b** The volatile organic compound (VOC) content, as applied, for each coating employed in this emissions unit shall not exceed 6.39 pounds of VOC per gallon of coating.
- 2.c** The VOC content of each cleanup material shall not exceed 7.61 pounds of VOC per gallon.
- 2.d** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the VOC content limitations, usage limitations, and the emissions limitations.
- 2.e** The lbs/hr VOC emissions limitation is based on the potential to emit of the emissions unit when coating miscellaneous metal parts. Therefore no hourly recordkeeping is required to determine compliance with this emissions limitation.
- 2.f** The emissions of Volatile Organic Compound (VOC) from emissions units R001 (Dip Coating Number 1), R002 (Dip Coating Number 2), R003 (Dip Coating Number 3), R004 (Dip Coating Number 4), R005 (Dip Coating Number 5), R006 (Dip Coating Number 6), R008 (Rotary Coater Number 1), R009 (Rotary Coater Number 2), R010 (Automatic Coater Number 1), R011 (Automated Coater number 2), R012 (Automated Nut Coater) and R013 (Dip Coating associated with Tumbling) combined shall not exceed 44.01 TPY. Compliance with the above limitation shall be based on a rolling, 12 month-summation.

The permittee has existing records to demonstrate compliance with this limitation upon permit issuance.

**B. Operational Restrictions**

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1. The maximum annual coating usage for emissions units R001-R006 and R008-R013 combined shall not exceed 6500 gallons per year with 20% waste recovery or 5200 gallons per year without waste recovery. Compliance with the above limitation shall be based on a rolling, 12 month-summation.
2. The maximum annual cleanup material usage for emissions units R001-R006 and R008-R013 combined shall not exceed 16,000 gallons per year with 55% waste recovery or 7200 gallons per year without waste recovery. Compliance with the above limitation shall be based on a rolling, 12 month-summation.
3. The maximum daily coating usage for this emissions unit shall not exceed 3 gallons, as applied, when coating miscellaneous metal parts.

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

1. The permittee shall collect and record the following information each day for this emissions unit when coating miscellaneous metal parts:
  - a. The name and identification number of each coating employed.
  - b. The volume, in gallons, of each coating employed, as applied.
2. This permittee shall collect and record the following information each month for the emissions units identified in term and condition A.2.f, combined:
  - a. The name and identification number of each coating employed.
  - b. The volume, in gallons, of each coating employed.
  - c. The total volume, in gallons, of all coatings employed.
  - d. The VOC content of each coating, in pounds per gallon, as applied.
  - e. The total VOC emissions from coatings in pounds per month (b x d).
  - f. The name and identification number of each cleanup material employed.
  - g. The volume, in gallons, of each cleanup material employed.
  - h. The VOC content of each cleanup material employed.

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- i. The total VOC emissions from cleanup materials employed in pounds per month (g x h).
  - j. The total VOC emissions from coatings and cleanup materials employed per month (e + i).
  - k. The updated rolling twelve month total combined coatings and cleanup materials employed, in gallons.
  - l. The updated rolling twelve month total combined VOC emissions from all coatings and cleanup materials employed, in pounds or tons.
3. The permittee shall collect and record the following information each month for the emissions units identified in term and condition A.2.a:
- a. The name and identification number of each coating used.
  - b. The individual Hazardous Air Pollutant (HAP) content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied.
  - c. The total combined HAP content of each coating in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (b)].
  - d. The number of gallons of each coating employed.
  - e. The name and identification of each organic cleanup material employed.
  - f. The individual HAP content for each HAP of each organic cleanup material in pounds of individual HAP per gallon of organic cleanup material, as applied.
  - g. The total combined HAP content of each organic cleanup material in pounds of combined HAPs per gallon of organic cleanup material, as applied [sum all the individual HAP contents from (f)].
  - h. The number of gallons of each organic cleanup material employed.
  - i. The total individual HAP emissions for each HAP from all coatings and organic cleanup materials employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each coating and the sum of (f) times (h) for each organic cleanup material].

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- j. The total combined HAP emissions from all coatings and organic cleanup materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each organic cleanup material].
- k. The updated rolling twelve month total of the total individual HAP emissions for each HAP from all coating and cleanup material employed, in pounds or tons.
- l. The updated rolling twelve month total of the total combined HAPs from all coating and cleanup material employed, in pounds or tons.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. This information does not have to be kept on a line-by-line basis.

- 4. The permit to install for this emissions was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

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

Pollutant: Toluene

TLV (ug/m3): 188,405

Maximum Hourly Emission Rate (lbs/hr): 2.9

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 338.0

MAGLC (ug/m3): 4486

Pollutant: Trichloroethylene

TLV (ug/m3): 268,712

Maximum Hourly Emission Rate (lbs/hr): 2.9

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 338.0

MAGLC (ug/m3): 6398

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

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impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic 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 Toxic Policy" 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 the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the

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toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic 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 Toxic 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 Toxic 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., VOC contents). The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.
2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing the use of more than three gallons of coatings when coating miscellaneous metal parts. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.
3. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month VOC emissions limitation set forth in term and condition A.2.f. or the coating or cleanup usage limitation in terms and conditions B.1. and B.2. The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by January 31, April 30, July 31 and October 31 of each year

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and shall cover the previous three calendar months (October through December, January through March, April through June and July through September, respectively.)

If no exceedances occurred, the permittee shall state so in the report.

4. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month HAP emissions limitations set forth in term A.2.a. The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous three calendar months (October through December, January through March, April through June and July through September, respectively.)

If no exceedances occurred, the permittee shall state so in the report.

5. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit unless otherwise specified.

#### **E. Testing Requirements**

1. Compliance with the emissions limitations in Section A of these terms and conditions shall be determined in accordance with the following method(s):

Emissions Limitation:

2.7 lbs of VOC/hour from coatings and cleanup materials.

Applicable Compliance Method:

The hourly VOC emissions limitation for coatings was determined by multiplying the maximum VOC content of applied coating and cleanup identified in term and condition A.2.b. and A.2.c. by the maximum hourly application rates identified in Permit To Install application 14-05826 [for coatings (6.39 lbs/gal)(0.38gal/hr), for cleanup (7.61 lbs/gal)(0.03 gal/hr)] and combining hourly coating and cleanup emissions.

Emissions Limitation:

44.01 TPY VOC, as a rolling, 12 month-summation, including coatings and cleanup materials.

Applicable Compliance Method:

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Compliance with the rolling, 12 month-summation VOC emissions limitation shall be determined by adding the annual emissions from coating and cleanup usage. Annual VOC emissions from coating shall be determined by multiplying the VOC content of applied coatings by the rolling, 12 month-summation of the usage. Annual VOC emissions from cleanup are determined by multiplying the VOC content of the cleanup by the rolling, 12 month-summation of the usage. The annual emissions from the coating and cleanup are then summed and divided by 2000 lb/ton to determine compliance with the annual emissions limitation on a rolling, 12 month-summation. Compliance shall be based upon the record keeping requirements as specified in term and condition C.2.

**Emissions Limitations:**

The total allowable emissions of Hazardous Air Pollutants (HAPs) from the emissions units identified in term and condition A.2.a. 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 HAPs emissions limitations shall be based on the record keeping requirements established in term and condition C.3.

2. USEPA methods 24 and 24A shall be used to determine the VOC content for coatings and cleanup materials. If, pursuant to Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A 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 precision statements for Method 24 or 24A.
3. Compliance with the operational restriction in term and condition B.1 shall be determined by the record keeping required in term and condition C.2.
4. Compliance with the operational restriction in term and condition B.2 shall be determined by the record keeping required in term and condition C.2.
5. Compliance with the operational restriction in term and condition B.3 shall be determined by the record keeping required in term and condition C.1.

**F. Miscellaneous Requirements**

1. The terms and conditions of this permit to install supersede the terms and conditions of Permit To Install 14-04664 issued on June 3, 1999.
2. The following terms and conditions of this permit to install shall be federally enforceable: A, B, C.1 through C.3, D, and E.

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Emissions Unit ID: **R011**

**Issued: To be entered upon final issuance**

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

1. 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R011 - Automated Coater Number 2	OAC rule 3745-31-05(A)(3)	<p>Volatile Organic Compound (VOC) emissions shall not exceed 2.7 lbs/hour for coatings and cleanup material when coating miscellaneous metal parts.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e)(ii) and OAC rule 3745-31-05(C).</p> <p>See terms and conditions A.2.b, A.2.c, B.1 and B.2.</p>
	OAC rule 3745-31-05(C) Synthetic Minor to avoid 40 CFR 63, Subpart Mmmm, Title V permitting and non-attainment new source review for VOC	See terms and conditions A.2.a and A.2.f.
	OAC rule 3745-21-09(U)(2)(e)(ii)	See term and condition B.3.

**2. Additional Terms and Conditions**

- 2.a The emissions of Hazardous Air Pollutants (HAPs) as identified in Section 112(b)

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of Title III of the Clean Air Act from emissions units R001 (Dip Coating Number 1), R002 (Dip Coating Number 2), R003 (Dip Coating Number 3), R004 (Dip Coating Number 4), R005 (Dip Coating Number 5), R006 (Dip Coating Number 6), R008 (Rotary Coater Number 1), R009 (Rotary Coater Number 2), R010 (Automatic Coater Number 1), R011 (Automated Coater number 2), R012 (Automated Nut Coater) and R013 (Dip Coating associated with Tumbling) 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.

The permittee has existing records to demonstrate compliance with this limitation upon permit issuance.

- 2.b** The volatile organic compound (VOC) content, as applied, for each coating employed in this emissions unit shall not exceed 6.39 pounds of VOC per gallon of coating.
- 2.c** The VOC content of each cleanup material shall not exceed 7.61 pounds of VOC per gallon.
- 2.d** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the VOC content limitations, usage limitations, and the emissions limitations.
- 2.e** The lbs/hr VOC emissions limitation is based on the potential to emit of the emissions unit when coating miscellaneous metal parts. Therefore no hourly recordkeeping is required to determine compliance with this emissions limitation.
- 2.f** The emissions of Volatile Organic Compound (VOC) from emissions units R001 (Dip Coating Number 1), R002 (Dip Coating Number 2), R003 (Dip Coating Number 3), R004 (Dip Coating Number 4), R005 (Dip Coating Number 5), R006 (Dip Coating Number 6), R008 (Rotary Coater Number 1), R009 (Rotary Coater Number 2), R010 (Automatic Coater Number 1), R011 (Automated Coater number 2), R012 (Automated Nut Coater) and R013 (Dip Coating associated with Tumbling) combined shall not exceed 44.01 TPY. Compliance with the above limitation shall be based on a rolling, 12 month-summation.

The permittee has existing records to demonstrate compliance with this limitation upon permit issuance.

**B. Operational Restrictions**

Emissions Unit ID: **R011**

1. The maximum annual coating usage for emissions units R001-R006 and R008-R013 combined shall not exceed 6500 gallons per year with 20% waste recovery or 5200 gallons per year without waste recovery. Compliance with the above limitation shall be based on a rolling, 12 month-summation.
2. The maximum annual cleanup material usage for emissions units R001-R006 and R008-R013 combined shall not exceed 16,000 gallons per year with 55% waste recovery or 7200 gallons per year without waste recovery. Compliance with the above limitation shall be based on a rolling, 12 month-summation.
3. The maximum daily coating usage for this emissions unit shall not exceed 3 gallons, as applied, when coating miscellaneous metal parts.

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

1. The permittee shall collect and record the following information each day for this emissions unit when coating miscellaneous metal parts:
  - a. The name and identification number of each coating employed.
  - b. The volume, in gallons, of each coating employed, as applied.
2. This permittee shall collect and record the following information each month for the emissions units identified in term and condition A.2.f, combined:
  - a. The name and identification number of each coating employed.
  - b. The volume, in gallons, of each coating employed.
  - c. The total volume, in gallons, of all coatings employed.
  - d. The VOC content of each coating, in pounds per gallon, as applied.
  - e. The total VOC emissions from coatings in pounds per month (b x d).
  - f. The name and identification number of each cleanup material employed.
  - g. The volume, in gallons, of each cleanup material employed.
  - h. The VOC content of each cleanup material employed.

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- i. The total VOC emissions from cleanup materials employed in pounds per month (g x h).
  - j. The total VOC emissions from coatings and cleanup materials employed per month (e + i).
  - k. The updated rolling twelve month total combined coatings and cleanup materials employed, in gallons.
  - l. The updated rolling twelve month total combined VOC emissions from all coatings and cleanup materials employed, in pounds or tons.
3. The permittee shall collect and record the following information each month for the emissions units identified in term and condition A.2.a:
- a. The name and identification number of each coating used.
  - b. The individual Hazardous Air Pollutant (HAP) content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied.
  - c. The total combined HAP content of each coating in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (b)].
  - d. The number of gallons of each coating employed.
  - e. The name and identification of each organic cleanup material employed.
  - f. The individual HAP content for each HAP of each organic cleanup material in pounds of individual HAP per gallon of organic cleanup material, as applied.
  - g. The total combined HAP content of each organic cleanup material in pounds of combined HAPs per gallon of organic cleanup material, as applied [sum all the individual HAP contents from (f)].
  - h. The number of gallons of each organic cleanup material employed.
  - i. The total individual HAP emissions for each HAP from all coatings and organic cleanup materials employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each coating and the sum of (f) times (h) for each organic cleanup material].

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- j. The total combined HAP emissions from all coatings and organic cleanup materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each organic cleanup material].
- k. The updated rolling twelve month total of the total individual HAP emissions for each HAP from all coating and cleanup material employed, in pounds or tons.
- l. The updated rolling twelve month total of the total combined HAPs from all coating and cleanup material employed, in pounds or tons.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. This information does not have to be kept on a line-by-line basis.

- 4. The permit to install for this emissions was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

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

Pollutant: Toluene

TLV (ug/m3): 188,405

Maximum Hourly Emission Rate (lbs/hr): 2.9

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 338.0

MAGLC (ug/m3): 4486

Pollutant: Trichloroethylene

TLV (ug/m3): 268,712

Maximum Hourly Emission Rate (lbs/hr): 2.9

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 338.0

MAGLC (ug/m3): 6398

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

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impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic 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 Toxic Policy" 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 the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic 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 Toxic 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 Toxic 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., VOC contents). The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.
2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing the use of more than three gallons of coatings when coating miscellaneous metal parts. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.
3. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month VOC emissions limitation set forth in term and condition A.2.f. or the coating or cleanup usage limitation in terms and conditions B.1. and B.2. The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous three calendar months (October through December, January through March, April through June and July through September, respectively.)

If no exceedances occurred, the permittee shall state so in the report.

4. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month HAP emissions limitations set forth in term A.2.a. The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous three calendar months (October through December, January through March, April through June and July through September, respectively.)

If no exceedances occurred, the permittee shall state so in the report.

5. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit unless otherwise specified.

#### E. Testing Requirements

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1. Compliance with the emissions limitations in Section A. of these terms and conditions shall be determined in accordance with the following method(s):

## Emissions Limitation:

2.7 lbs of VOC/hour from coatings and cleanup.

## Applicable Compliance Method:

The hourly VOC emissions limitation for coatings was determined by multiplying the maximum VOC content of applied coating and cleanup identified in term and condition A.2.b and A.2.c by the maximum hourly application rates identified in Permit To Install application 14-05826 [for coatings (6.39 lbs/gal)(0.38gal/hr), for cleanup (7.61 lbs/gal)(0.03 gal/hr)] and combining hourly coating and cleanup emissions.

## Emissions Limitation:

44.01 TPY VOC, as a rolling, 12 month-summation, including coatings and cleanup materials.

## Applicable Compliance Method:

Compliance with the rolling, 12 month-summation VOC emissions limitation shall be determined by adding the annual emissions from coating and cleanup usage. Annual VOC emissions from coating shall be determined by multiplying the VOC content of applied coatings by the rolling, 12 month-summation of the usage. Annual VOC emissions from cleanup are determined by multiplying the VOC content of the cleanup by the rolling, 12 month-summation of the usage. The annual emissions from the coating and cleanup are then summed and divided by 2000 lb/ton to determine compliance with the annual emissions limitation on a rolling, 12 month-summation. Compliance shall be based upon the record keeping requirements as specified in term and condition C.2.

## Emissions Limitations:

The total allowable emissions of Hazardous Air Pollutants (HAPs) from the emissions units identified in term and condition A.2.a. 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 HAPs emissions limitations shall be based on the record keeping requirements established in term and condition C.3.

2. USEPA methods 24 and 24A shall be used to determine the VOC content for coatings and cleanup materials. If, pursuant to Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A 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 precision statements for Method 24 or 24A.
3. Compliance with the operational restriction in term and condition B.1 shall be determined by the record keeping required in term and condition C.2.
4. Compliance with the operational restriction in term and condition B.2 shall be determined by the record keeping required in term and condition C.2.
5. Compliance with the operational restriction in term and condition B.3 shall be determined by the record keeping required in term and condition C.1.

**F. Miscellaneous Requirements**

1. The terms and conditions of this permit to install supersede the terms and conditions of Permit To Install 14-04664 issued on June 3, 1999.
2. The following terms and conditions of this permit to install shall be federally enforceable: A, B, C.1 through C.3, D, and E.

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**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

1. 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R012 - Automated Nut Coater	OAC rule 3745-31-05(A)(3)	<p>Volatile Organic Compound (VOC) emissions shall not exceed 2.7 lbs/hour for coatings and cleanup material when coating miscellaneous metal parts.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e)(ii) and OAC rule 3745-31-05(C).</p> <p>See terms and conditions A.2.b, A.2.c, B.1, and B.2.</p>
	OAC rule 3745-31-05(C) Synthetic Minor to avoid 40 CFR 63 Subpart M, Title V permitting and non-attainment new source review for VOC	See terms and conditions A.2.a and A.2.f.
	OAC rule 3745-21-09(U)(2)(e)(ii)	See term and condition B.3.

**2. Additional Terms and Conditions**

- 2.a The emissions of Hazardous Air Pollutants (HAPs) as identified in Section 112(b)

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of Title III of the Clean Air Act from emissions units R001 (Dip Coating Number 1), R002 (Dip Coating Number 2), R003 (Dip Coating Number 3), R004 (Dip Coating Number 4), R005 (Dip Coating Number 5), R006 (Dip Coating Number 6), R008 (Rotary Coater Number 1), R009 (Rotary Coater Number 2), R010 (Automatic Coater Number 1), R011 (Automated Coater number 2), R012 (Automated Nut Coater) and R013 (Dip Coating associated with Tumbling) 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.

The permittee has existing records to demonstrate compliance with this limitation upon permit issuance.

- 2.b** The volatile organic compound (VOC) content, as applied, for each coating employed in this emissions unit shall not exceed 6.39 pounds of VOC per gallon of coating.
- 2.c** The VOC content of each cleanup material shall not exceed 7.61 pounds of VOC per gallon.
- 2.d** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the VOC content limitations, usage limitations, and the emissions limitations.
- 2.e** The lbs/hr VOC emissions limitation is based on the potential to emit of the emissions unit when coating miscellaneous metal parts. Therefore no hourly recordkeeping is required to determine compliance with this emissions limitation.
- 2.f** The emissions of Volatile Organic Compound (VOC) from emissions units R001 (Dip Coating Number 1), R002 (Dip Coating Number 2), R003 (Dip Coating Number 3), R004 (Dip Coating Number 4), R005 (Dip Coating Number 5), R006 (Dip Coating Number 6), R008 (Rotary Coater Number 1), R009 (Rotary Coater Number 2), R010 (Automatic Coater Number 1), R011 (Automated Coater number 2), R012 (Automated Nut Coater) and R013 (Dip Coating associated with Tumbling) combined shall not exceed 44.01 TPY. Compliance with the above limitation shall be based on a rolling, 12 month-summation.

The permittee has existing records to demonstrate compliance with this limitation upon permit issuance.

- 2.g** The hourly VOC emissions limitation is based on the emissions unit's Potential To Emit. Therefore, no hourly records are required to demonstrate compliance with

this emissions limitation.

## B. Operational Restrictions

1. The maximum annual coating usage for emissions units R001-R006 and R008-R013 combined shall not exceed 6500 gallons per year with 20% waste recovery or 5200 gallons per year without waste recovery. Compliance with the above limitation shall be based on a rolling, 12 month-summation.
2. The maximum annual cleanup material usage for emissions units R001-R006 and R008-R013 combined shall not exceed 16,000 gallons per year with 55% waste recovery or 7200 gallons per year without waste recovery. Compliance with the above limitation shall be based on a rolling, 12 month-summation.
3. The maximum daily coating usage for this emissions unit shall not exceed 3 gallons, as applied, when coating miscellaneous metal parts.

## C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit when coating miscellaneous metal parts:
  - a. The name and identification number of each coating employed.
  - b. The volume, in gallons, of each coating employed, as applied.
2. This permittee shall collect and record the following information each month for the emissions units identified in term and condition A.2.f, combined:
  - a. The name and identification number of each coating employed.
  - b. The volume, in gallons, of each coating employed.
  - c. The total volume, in gallons, of all coatings employed.
  - d. The VOC content of each coating, in pounds per gallon, as applied.
  - e. The total VOC emissions from coatings in pounds per month (b x d).
  - f. The name and identification number of each cleanup material employed.

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- g. The volume, in gallons, of each cleanup material employed.
  - h. The VOC content of each cleanup material employed.
  - i. The total VOC emissions from cleanup materials employed in pounds per month (g x h).
  - j. The total VOC emissions from coatings and cleanup materials employed per month (e + i).
  - k. The updated rolling twelve month total combined coatings and cleanup materials employed, in gallons.
  - l. The updated rolling twelve month total combined VOC emissions from all coatings and cleanup materials employed, in pounds or tons.
3. The permittee shall collect and record the following information each month for the emissions units identified in term and condition A.2.a:
  - a. The name and identification number of each coating used.
  - b. The individual Hazardous Air Pollutant (HAP) content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied.
  - c. The total combined HAP content of each coating in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (b)].
  - d. The number of gallons of each coating employed.
  - e. The name and identification of each organic cleanup material employed.
  - f. The individual HAP content for each HAP of each organic cleanup material in pounds of individual HAP per gallon of organic cleanup material, as applied.
  - g. The total combined HAP content of each organic cleanup material in pounds of combined HAPs per gallon of organic cleanup material, as applied [sum all the individual HAP contents from (f)].
  - h. The number of gallons of each organic cleanup material employed.
  - i. The total individual HAP emissions for each HAP from all coatings and organic

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cleanup materials employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each coating and the sum of (f) times (h) for each organic cleanup material].

- j. The total combined HAP emissions from all coatings and organic cleanup materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each organic cleanup material].
- k. The updated rolling twelve month total of the total individual HAP emissions for each HAP from all coating and cleanup material employed, in pounds or tons.
- l. The updated rolling twelve month total of the total combined HAPs from all coating and cleanup material employed, in pounds or tons.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. This information does not have to be kept on a line-by-line basis.

- 4. The permit to install for this emissions was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

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

Pollutant: Toluene

TLV (ug/m3): 188,405

Maximum Hourly Emission Rate (lbs/hr): 2.9

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 338.0

MAGLC (ug/m3): 4486

Pollutant: Trichloroethylene

TLV (ug/m3): 268,712

Maximum Hourly Emission Rate (lbs/hr): 2.9

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 338.0

MAGLC (ug/m3): 6398

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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 Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic 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 Toxic Policy" 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 the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic 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 Toxic 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 Toxic 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., VOC contents). The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.
2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing the use of more than three gallons of coatings when coating miscellaneous metal parts. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.
3. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month VOC emissions limitation set forth in term and condition A.2.f. or the coating or cleanup usage limitation in terms and conditions B.1. and B.2. The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous three calendar months (October through December, January through March, April through June and July through September, respectively.)

If no exceedances occurred, the permittee shall state so in the report.

4. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month HAP emissions limitations set forth in term A.2.a. The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous three calendar months (October through December, January through March, April through June and July through September, respectively.)

If no exceedances occurred, the permittee shall state so in the report.

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5. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit unless otherwise specified.

**E. Testing Requirements**

1. Compliance with the emissions limitations in Section A of these terms and conditions shall be determined in accordance with the following method(s):

Emissions Limitation:

2.7 lbs of VOC/day from coatings and cleanup.

Applicable Compliance Method:

The hourly VOC emissions limitation for coatings was determined by multiplying the maximum VOC content of applied coating and cleanup identified in term and condition A.2.b and A.2.c by the maximum hourly application rates identified in Permit To Install application 14-05826 [for coatings (6.39 lbs/gal)(0.38gal/hr), for cleanup (7.61 lbs/gal)(0.03 gal/hr)] and combining hourly coating and cleanup emissions.

Emissions Limitation:

44.01 TPY of VOC, as a rolling, 12 month-summation, including coatings and cleanup materials.

Applicable Compliance Method:

Compliance with the rolling, 12 month-summation VOC emissions limitation shall be determined by adding the annual emissions from coating and cleanup usage. Annual VOC emissions from coating shall be determined by multiplying the VOC content of applied coatings by the rolling, 12 month-summation of the usage. Annual VOC emissions from cleanup are determined by multiplying the VOC content of the cleanup by the rolling, 12 month-summation of the usage. The annual emissions from the coating and cleanup are then summed and divided by 2000 lb/ton to determine compliance with the annual emissions limitation on a rolling, 12 month-summation. Compliance shall be based upon the record keeping requirements as specified in term and condition C.2.

Emissions Limitations:

The total allowable emissions of Hazardous Air Pollutants (HAPs) from the emissions units identified in term and condition A.2.a. 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 HAPs emissions limitations shall be based on the record keeping requirements established in term and condition C.3.

2. USEPA methods 24 and 24A shall be used to determine the VOC content for coatings and cleanup materials. If, pursuant to Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A 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 precision statements for Method 24 or 24A.
3. Compliance with the operational restriction in term and condition B.1 shall be determined by the record keeping required in term and condition C.2.
4. Compliance with the operational restriction in term and condition B.2 shall be determined by the record keeping required in term and condition C.2.
5. Compliance with the operational restriction in term and condition B.3 shall be determined by the record keeping required in term and condition C.1.

#### **F. Miscellaneous Requirements**

1. The following terms and conditions of this permit to install shall be federally enforceable: A, B, C.1 through C.3, D, and E.

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**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

1. 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R013 - Dip Coating associated with Tumbling	OAC rule 3745-31-05(A)(3)	<p>Volatile Organic Compound (VOC) emissions shall not exceed 4.6 lbs/hour for coatings and cleanup material when coating miscellaneous metal parts.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e)(ii) and OAC rule 3745-31-05(C).</p> <p>See terms and conditions A.2.b, A.2.c, B.1, and B.2.</p>
	OAC rule 3745-31-05(C) Synthetic Minor to avoid 40 CFR 63, Subpart Mmmm, Title V permitting and non-attainment new source review for VOC	See terms and conditions A.2.a and A.2.f.
	OAC rule 3745-21-09(U)(2)(e)(ii)	See term and condition B.3.

**2. Additional Terms and Conditions**

- 2.a The emissions of Hazardous Air Pollutants (HAPs) as identified in Section 112(b)

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of Title III of the Clean Air Act from emissions units R001 (Dip Coating Number 1), R002 (Dip Coating Number 2), R003 (Dip Coating Number 3), R004 (Dip Coating Number 4), R005 (Dip Coating Number 5), R006 (Dip Coating Number 6), R008 (Rotary Coater Number 1), R009 (Rotary Coater Number 2), R010 (Automatic Coater Number 1), R011 (Automated Coater number 2), R012 (Automated Nut Coater) and R013 (Dip Coating associated with Tumbling) 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.

The permittee has existing records to demonstrate compliance with this limitation upon permit issuance.

- 2.b** The volatile organic compound (VOC) content, as applied, for each coating employed in this emissions unit shall not exceed 6.39 pounds of VOC per gallon of coating.
- 2.c** The VOC content of each cleanup material shall not exceed 7.61 pounds of VOC per gallon.
- 2.d** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the VOC content limitations, usage limitations, and the emissions limitations.
- 2.e** The lbs/hr VOC emissions limitation is based on the potential to emit of the emissions unit when coating miscellaneous metal parts. Therefore no hourly recordkeeping is required to determine compliance with this emissions limitation.
- 2.f** The emissions of Volatile Organic Compound (VOC) from emissions units R001 (Dip Coating Number 1), R002 (Dip Coating Number 2), R003 (Dip Coating Number 3), R004 (Dip Coating Number 4), R005 (Dip Coating Number 5), R006 (Dip Coating Number 6), R008 (Rotary Coater Number 1), R009 (Rotary Coater Number 2), R010 (Automatic Coater Number 1), R011 (Automated Coater number 2), R012 (Automated Nut Coater) and R013 (Dip Coating associated with Tumbling) combined shall not exceed 44.01 TPY. Compliance with the above limitation shall be based on a rolling, 12 month-summation.

The permittee has existing records to demonstrate compliance with this limitation upon permit issuance.

**B. Operational Restrictions**

Emissions Unit ID: **R013**

1. The maximum annual coating usage for emissions units R001-R006 and R008-R013 combined shall not exceed 6500 gallons per year with 20% waste recovery or 5200 gallons per year without waste recovery. Compliance with the above limitation shall be based on a rolling, 12 month-summation.
2. The maximum annual cleanup material usage for emissions units R001-R006 and R008-R013 combined shall not exceed 16,000 gallons per year with 55% waste recovery or 7200 gallons per year without waste recovery. Compliance with the above limitation shall be based on a rolling, 12 month-summation.
3. The maximum daily coating usage for this emissions unit shall not exceed 3 gallons, as applied, when coating miscellaneous metal parts.

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

1. The permittee shall collect and record the following information each day for this emissions unit when coating miscellaneous metal parts:
  - a. The name and identification number of each coating employed.
  - b. The volume, in gallons, of each coating employed, as applied.
2. This permittee shall collect and record the following information each month for the emissions units identified in term and condition A.2.f, combined:
  - a. The name and identification number of each coating employed.
  - b. The volume, in gallons, of each coating employed.
  - c. The total volume, in gallons, of all coatings employed.
  - d. The VOC content of each coating, in pounds per gallon, as applied.
  - e. The total VOC emissions from coatings in pounds per month (b x d).
  - f. The name and identification number of each cleanup material employed.
  - g. The volume, in gallons, of each cleanup material employed.
  - h. The VOC content of each cleanup material employed.

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- i. The total VOC emissions from cleanup materials employed in pounds per month (g x h).
  - j. The total VOC emissions from coatings and cleanup materials employed per month (e + i).
  - k. The updated rolling twelve month total combined coatings and cleanup materials employed, in gallons.
  - l. The updated rolling twelve month total combined VOC emissions from all coatings and cleanup materials employed, in pounds or tons.
3. The permittee shall collect and record the following information each month for the emissions units identified in term and condition A.2.a:
  - a. The name and identification number of each coating used.
  - b. The individual Hazardous Air Pollutant (HAP) content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied.
  - c. The total combined HAP content of each coating in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (b)].
  - d. The number of gallons of each coating employed.
  - e. The name and identification of each organic cleanup material employed.
  - f. The individual HAP content for each HAP of each organic cleanup material in pounds of individual HAP per gallon of organic cleanup material, as applied.
  - g. The total combined HAP content of each organic cleanup material in pounds of combined HAPs per gallon of organic cleanup material, as applied [sum all the individual HAP contents from (f)].
  - h. The number of gallons of each organic cleanup material employed.
  - i. The total individual HAP emissions for each HAP from all coatings and organic cleanup materials employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each coating and the sum of (f) times (h) for each organic cleanup material].

- j. The total combined HAP emissions from all coatings and organic cleanup materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each organic cleanup material].
- k. The updated rolling twelve month total of the total individual HAP emissions for each HAP from all coating and cleanup material employed, in pounds or tons.
- l. The updated rolling twelve month total of the total combined HAPs from all coating and cleanup material employed, in pounds or tons.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. This information does not have to be kept on a line-by-line basis.

- 4. The permit to install for this emissions was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

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

Pollutant: Toluene

TLV (ug/m3): 188,405

Maximum Hourly Emission Rate (lbs/hr): 2.9

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 338.0

MAGLC (ug/m3): 4486

Pollutant: Trichloroethylene

TLV (ug/m3): 268,712

Maximum Hourly Emission Rate (lbs/hr): 2.9

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 338.0

MAGLC (ug/m3): 6398

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

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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 Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic 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 Toxic Policy" 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 the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the

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toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic 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 Toxic 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 Toxic 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., VOC contents). The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.
2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing the use of more than three gallons of coatings when coating miscellaneous metal parts. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.
3. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month VOC emissions limitation set forth in term and condition A.2.f. or the coating or cleanup usage limitation in terms and conditions B.1. and B.2. The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by January 31, April 30, July 31 and October 31 of each year

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and shall cover the previous three calendar months (October through December, January through March, April through June and July through September, respectively.)

If no exceedances occurred, the permittee shall state so in the report.

4. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month HAP emissions limitations set forth in term A.2.a. The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous three calendar months (October through December, January through March, April through June and July through September, respectively.)

If no exceedances occurred, the permittee shall state so in the report.

5. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit unless otherwise specified.

#### **E. Testing Requirements**

1. Compliance with the emissions limitations in Section A of these terms and conditions shall be determined in accordance with the following method(s):

Emissions Limitation:

4.6 lbs of VOC/hour from coatings and cleanup.

Applicable Compliance Method:

The hourly VOC emissions limitation for coatings was determined by multiplying the maximum VOC content of applied coating and cleanup identified in term and condition A.2.b and A.2.c by the maximum hourly application rates identified in Permit To Install application 14-05826 [for coatings (6.39 lbs/gal)(0.38gal/hr), for cleanup (7.61 lbs/gal)(0.28 gal/hr)] and combining hourly coating and cleanup emissions. The hourly VOC emissions limitation is based on the emissions unit's Potential To Emit. Therefore, no hourly records are required to demonstrate compliance with this emissions limitation.

Emissions Limitation:

44.01 TPY of VOC, as a rolling, 12 month-summation, including coatings and cleanup materials.

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## Applicable Compliance Method:

Compliance with the rolling, 12 month-summation VOC emissions limitation shall be determined by adding the annual emissions from coating and cleanup usage. Annual VOC emissions from coating shall be determined by multiplying the VOC content of applied coatings by the rolling, 12 month-summation of the usage. Annual VOC emissions from cleanup are determined by multiplying the VOC content of the cleanup by the rolling, 12 month-summation of the usage. The annual emissions from the coating and cleanup are then summed and divided by 2000 lb/ton to determine compliance with the annual emissions limitation on a rolling, 12 month-summation. Compliance shall be based upon the record keeping requirements as specified in term and condition C.2.

Emissions Limitations:

The total allowable emissions of Hazardous Air Pollutants (HAPs) from the emissions units identified in term and condition A.2.a. 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 HAPs emissions limitations shall be based on the record keeping requirements established in term and condition C.3.

2. USEPA methods 24 and 24A shall be used to determine the VOC content for coatings and cleanup materials. If, pursuant to Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A 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 precision statements for Method 24 or 24A.
3. Compliance with the operational restriction in term and condition B.1 shall be determined by the record keeping required in term and condition C.2.
4. Compliance with the operational restriction in term and condition B.2 shall be determined by the record keeping required in term and condition C.2.
5. Compliance with the operational restriction in term and condition B.3 shall be determined by the record keeping required in term and condition C.1.

**F. Miscellaneous Requirements**

1. The following terms and conditions of this permit to install shall be federally enforceable: A, B, C.1 through C.3, D, and E.