



State of Ohio Environmental Protection Agency

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

**CERTIFIED MAIL**

Street Address:

122 S. Front Street

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

Mailing Address:

Lazarus Gov. Center  
P.O. Box 1049

**Application No: 14-05874**

**Fac ID: 1409010995**

**DATE: 11/7/2006**

Apache Industries, Inc.  
Barry Slye  
1700 MADE Industrial Drive  
Middletown, OH 45044

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

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

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

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

Sincerely,

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

CC: USEPA

HCDES



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**Permit To Install  
Terms and Conditions**

**Issue Date: 11/7/2006  
Effective Date: 11/7/2006**

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**FINAL PERMIT TO INSTALL 14-05874**

Application Number: 14-05874  
Facility ID: 1409010995  
Permit Fee: **\$800**  
Name of Facility: Apache Industries, Inc.  
Person to Contact: Barry Slye  
Address: 1700 MADE Industrial Dive  
Middletown, OH 45044

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**2700 Oxford State Road  
Middletown, Ohio**

Description of proposed emissions unit(s):  
**First Permit To Install application for an existing Sandblasting and Painting operation.**

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

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## Part I - GENERAL TERMS AND CONDITIONS

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

#### 1. Compliance Requirements

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

#### 2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted 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

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

**5. Scheduled Maintenance/Malfunction Reporting**

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

**6. Permit Transfers**

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

**7. Air Pollution Nuisance**

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

**8. Termination of Permit to Install**

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

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

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

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

#### **10. Public Disclosure**

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

#### **11. Applicability**

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

#### **12. Best Available Technology**

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

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

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

**14. Construction Compliance Certification**

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

**15. Fees**

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

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

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
PE	2.98
PM10	0.44
VOC	8.43

## 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.

#### Operations, Property, and/or Equipment - (K001) - Miscellaneous metal parts painting

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>Volatile Organic Compound (VOC) emissions from this emissions unit shall not exceed 42.0 pounds/day (coatings only) and 8.43 TPY (coatings and clean-up.)</p> <p>See Sections A.2.a and A.2.b below.</p> <p>The requirements of this rule shall include compliance with the requirements of OAC rule 3745-21-09(U)(1)(c).</p>
OAC rule 3745-21-09(U)(1)(c)	See Section A.2.c below.

### 2. Additional Terms and Conditions

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the coating VOC content limitation and the mass emission limitations.
- 2.b The daily emission limitation outlined above is based on the emissions unit's potential to emit (PTE). Therefore, no emission records or reports are required to demonstrate compliance with these limitations.
- 2.c The VOC content of each coating employed shall not exceed 3.5 pounds of VOC per gallon, as applied, excluding water and exempt solvents.

### B. Operational Restrictions

None

### C. Monitoring and/or Recordkeeping Requirements

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1. The permittee shall collect and record the following information each month for the coating line:
  - a. the name and identification number of each coating employed;
  - b. the VOC content (excluding water and exempt solvents) of each coating, as applied;
  - c. the number of gallons (excluding water and exempt solvents) of each coating, as applied; and
  - d. the monthly VOC emissions from all the coatings employed, in pounds, [i.e., the sum of (b) times (c) for each coating employed].
  
2. The permittee shall collect and record the following information for each month for this emissions unit:
  - a. the company identification of each cleanup material employed;
  - b. the number of gallons of each cleanup material employed;
  - c. the VOC content of each cleanup material employed, in pounds per gallon;
  - d. the total VOC emissions from all the cleanup materials employed, in pounds [i.e., the sum of (b) times (c) for each cleanup material employed];
  - e. the amount of cleanup material recovered, in pounds; and
  - f. the total monthly VOC emissions from cleanup operations, in pounds [i.e., (d) - (e)].
  
3. The permittee shall calculate and record the total annual VOC emissions from coatings and cleanup materials, [i.e., the sum of the monthly VOC emission rates from the coating materials for the calendar year in Section C.1 plus the sum of the monthly emissions from cleanup materials for the calendar year in Section C.2].

**D. Reporting Requirements**

1. The permittee shall notify the Hamilton County Department of Environmental Services

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in writing of each record showing a coating VOC content greater than 3.5 pounds VOC per gallon, as applied, excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days after the exceedance occurs.

2. The permittee shall submit annual compliance reports that include:
  - a. a list of all allowable emissions limitations in Section A.1 and A.2; and
  - b. a statement whether the emission unit is in compliance with the requirements listed.

The report shall be submitted to the Hamilton County Department of Environmental Services by February 1 of each year and shall cover the previous calendar year.

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

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

Emission Limitations:

Volatile Organic Compound (VOC) emissions from this emissions unit shall not exceed 42.0 pounds/day (coatings only) and 8.43 TPY (coatings and clean-up.)

Applicable Compliance Method:

Compliance with the daily VOC emission limitation shall be demonstrated by multiplying the maximum daily coating usage of 12 gallons per day, excluding water and exempt solvents, by the coating VOC content of 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents. Compliance with the annual emission limitation shall be based upon the record keeping specified in Section C.3.

Emission Limitation:

The VOC content of each coating employed shall not exceed 3.5 pounds of VOC per gallon, as applied, excluding water and exempt solvents.

Applicable Compliance Method:

In accordance with OAC rule 3745-21-04(B)(5), facilities located in Ashtabula, Butler, Clark, Clermont, Cuyahoga, Delaware, Franklin, Geauga, Greene, Hamilton, Lake, Licking, Lorain, Lucas, Mahoning, Medina, Miami, Montgomery, Portage, Stark, Summit, Trumbull, Warren and Wood Counties shall use USEPA Method 24 to

Emissions Unit ID: **K001**

determine the VOC contents of the coatings. If an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

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

## **F. Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic pollutant will be less than 1.0 ton. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that a new permit to install application would be required for an emissions unit if changes in the composition of the materials or use of new materials would cause the emissions of any pollutant that has a listed Threshold Limit Value (TLV), as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices"), to increase to above 1.0 ton per year

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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.

**Operations, Property, and/or Equipment - (P001) - Sand blasting**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-17-07(B)	Visible particulate emissions of fugitive dust shall not exceed 20 per cent opacity as a three-minute average.
OAC rule 3745-17-08(B)	The permittee shall utilize reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust. See section A.2.b.
OAC rule 3745-31-05(A)(3)	<p>Particulate emissions (PE) shall not exceed 0.68 pound/hour and 2.98 tons/year.</p> <p>Particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.10 pound/hour and 0.44 ton/year.</p> <p>See sections A.2.a and A.2.c.</p> <p>The requirements of this rule shall include compliance with the requirements of OAC rule 3745-17-07(B) and OAC rule 3745-17-08(B).</p>

**2. Additional Terms and Conditions**

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of a water induction nozzle system, the use of tarping around the blast area and compliance with the visible emissions limitations and mass emissions limitations.
- 2.b The permittee shall employ reasonably available control measures while sandblasting metal parts for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to employ a water induction nozzle system and install tarping around the blast area to ensure compliance.

Emissions Unit ID: P001

Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

- 2.c The hourly and annual emission limitations outlined above are based on the emission unit's potential to emit (PTE). Therefore, no emission records or reports are required to demonstrate compliance with these limitations.

**B. Operational Restrictions**

None

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

1. The permittee shall maintain records of the following information:
  - a. the dates the reasonably available control measures in term A.2.b were not employed while sandblasting metal parts.

**D. Reporting Requirements**

1. The permittee shall submit deviation reports to the Hamilton County Department of Environmental Services that identify the following occurrences:
  - a. each day during which sandblasting metal parts took place without employing the reasonably available control measures in term A.2.b.
2. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

**E. Testing Requirements**

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

Emission Limitations:

Visible particulate emissions of fugitive dust shall not exceed 20 percent opacity as a three-minute average.

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified

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in OAC rule 3745-17-03(B)(3).

**Emission Limitations:**

Particulate emissions (PE) shall not exceed 0.68 pound/hour and particulate matter less than or equal to 10 microns in diameter (PM10) shall not exceed 0.10 pound/hour

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Applicable Compliance Method:

Hourly emissions of particulate emissions (PE) and particulate matter less than or equal to 10 microns in diameter (PM10) shall be calculated and compliance determined using the following equations.

$$\text{lb PE/hr} = (A) \times (B) \times (D)$$

$$\text{lb PM10/hr} = (A) \times (C) \times (D)$$

Where,

A = maximum hourly amount of abrasive used, in pounds/hour.

B = PE emission factor of 91 lbs/thousand lbs of abrasive used, from AP-42 Section 13.2.6 (September, 1997).

C = PM10 emission factor of 13 lbs/thousand lbs of abrasive used, from AP-42 Section 13.2.6 (September, 1997).

D = 0.975 = one minus an overall control efficiency of 97.5 percent, accounting for the use of a water nozzle and tarps.

Emission Limitations:

PE shall not exceed 2.98 ton/year and PM10 shall not exceed 0.44 ton/year.

Applicable Compliance Method:

Annual emissions of particulate emissions (PE) and particulate matter less than or equal to 10 microns (PM10) shall be calculated and compliance determined using the following equations.

$$\text{Tons PE/yr} = (A) \times (B) \times (D) \times 0.0005 \text{ tons/lb.}$$

$$\text{Tons PM10/yr} = (A) \times (C) \times (D) \times 0.0005 \text{ tons/lb.}$$

Where,

A = maximum annual amount of abrasive used, in pounds/year.

B = PE emission factor of 91 lbs/thousand lbs of abrasive used, from AP-42 Section 13.2.6 (September, 1997).

C = PM10 emission factor of 13 lbs/thousand lbs of abrasive used, from AP-42 Section 13.2.6 (September, 1997).

D = 0.975 = one minus an overall control efficiency of 97.5 percent, accounting for the use of a water nozzle and tarps.

## F. Miscellaneous Requirements

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**Emissions Unit ID: P001**

None