

Synthetic Minor Determination and/or **Netting Determination**
Permit To Install **14-05779**

A. Source Description

The two duplex spray paint booths, emissions units K001 and K003, are being modified to coat miscellaneous metal parts, predominantly for military vehicles. All parts are hung on conveyors and sprayed by high volume low pressure (HVLP) spray paint guns as they pass through the booths. The organic compound (OC) emissions from the solvent metal cleaning will be accounted for in a new emissions unit, P001.

B. Facility Emissions and Attainment Status

Butler County is currently non-attainment for ozone (volatile organic compounds) and particulate matter less than 2.5 microns in diameter (PM2.5) and attainment for all other criteria pollutants. Facility wide actual emissions in 2004 were 17 tons of volatile organic compounds (VOC).

C. Source Emissions

Trans-Acc now states that each of the four stations of emissions units K001 and K003 can apply 7 gallons per hour. At 28 gallons per hour with a maximum VOC content coating of 3.50 lbs/gallon, the maximum hourly emissions would be 98 lbs VOC per hour combined. The facility requests 98 lbs/hr of VOC emissions from coatings and 1344 lbs of OC per day from cleanup materials. Short term limitations are based on maximum hourly potential to emit (PTE). Annually the facility will have an OC emission limitation of 126 tons per year (tpy), a VOC emission limitation of 84.0 tpy, and HAP emission limitations of 9.9 tpy for a single HAP and 24.9 tpy for combined HAPs.

D. Conclusion

Trans-Acc Hamilton has been a true minor and will now be a Synthetic Minor for VOC's and HAPs emissions. This synthetic minor permit is to avoid Non-attainment New Source Review for VOC emissions and Title V permitting for VOC and HAP emissions.



State of Ohio Environmental Protection Agency

**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: 14-05779

Fac ID: 1409040883

DATE: 2/28/2006

Trans-Acc., Inc. / Hamilton
Andrew Slonkosky
11167 Deerfield Road
Cincinnati, OH 452422094

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 **\$600** 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

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

CC: USEPA

HCDES

OH-KY-IN Reg Council of Govs

KY

IN

BUTLER COUNTY

PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL **14-05779** FOR AN AIR CONTAMINANT SOURCE FOR
Trans-Acc., Inc. / Hamilton

On 2/28/2006 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Trans-Acc., Inc. / Hamilton**, located at **845 East Avenue, Hamilton, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 14-05779:

Install a new painting station, increase allowable emissions and combine recordkeeping.

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 14-05779

Application Number: 14-05779
Facility ID: 1409040883
Permit Fee: **To be entered upon final issuance**
Name of Facility: Trans-Acc., Inc. / Hamilton
Person to Contact: Andrew Slonkosky
Address: 11167 Deerfield Road
Cincinnati, OH 452422094

Location of proposed air contaminant source(s) [emissions unit(s)]:
**845 East Avenue
Hamilton, Ohio**

Description of proposed emissions unit(s):
Install a new painting station, increase allowable emissions and combine recordkeeping.

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,

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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

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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

Emissions Unit ID: **K001**

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

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	84.0
OC	126.0
combined HAPs	24.9
single HAPs	9.9

Trans-Acc., Inc. / Hamilton
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Emissions Unit ID: K001

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 rule 3745-21-09(U)(1)(d)
		OAC rule 3745-21-09(U)(1)(i)
K001 - Metal Parts Coating Booth	OAC rule 3745-31-05(A)(3)	OAC rule 3745-31-05(C)
		(Synthetic Minor to Avoid Title V and Non-Attainment New Source Review)

OAC rule 3745-21-09(U)(1)(c)

Applicable Emissions
Limitations/Control Measures

Volatile Organic Compound (VOC) emissions from this emissions unit shall not exceed 49.0 lbs/hour, excluding cleanup.

Organic Compound (OC) emissions from this emissions unit shall not exceed 49.0 lbs/hour, excluding cleanup.

OC emissions from emissions units K001, K003 and P001 combined shall not exceed 126.0 tons per year (TPY), including cleanup.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1)(c), OAC rule 3745-21-09(U)(1)(d), OAC rule 3745-21-09(U)(1)(i) and OAC rule 3745-31-05(C).

See term and condition A.2.a and B.1.

See term and condition A.2.b.

See term and condition A.2.c.

See term and condition A.2.d.

See terms and conditions A.2.e, A.2.f, and B.2.

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

- 2.a** The hourly emissions limitations specified for VOC and OC in term and condition A.1. are based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with these limits.
- 2.b** The volatile organic compound (VOC) content for each extreme performance coating employed in this emissions unit shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.
- 2.c** The volatile organic compound (VOC) content for each coating employed in this emissions unit that is dried at temperatures not exceeding two hundred degrees Fahrenheit shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.
- 2.d** The volatile organic compound (VOC) content for each coating employed in this emissions unit that is not regulated under OAC rule 3745-21-09(U)(a) to OAC rule 3745-21-09(U)(h) shall not exceed 3.0 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.
- 2.e** The emissions of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from emissions units K001 (Metal Parts Coating Booth), K002 (Metal Parts Coating Booth), K003 (Metal Parts Coating Booth) and P001 (Solvent Wipe Cleaning) 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 HAPs records to demonstrate compliance with the emissions limitations in term and condition A.2.e upon permit issuance.

- 2.f** The combined annual VOC emissions from emissions units K001 (Metal Parts Coating Booth), K003 (Metal Parts Coating Booth) and P001 (Solvent Metal Cleaning) shall not exceed 84.0 tons per year. Compliance with the above emissions limitation shall be based on a rolling, 12 month-summation.

The permittee has existing VOC records to demonstrate compliance with the emissions limitation in term and condition A.2.f upon permit issuance.

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

Trans**PTI A**Emissions Unit ID: **K001****Issued: To be entered upon final issuance**

limitations.

B. Operational Restrictions

1. The total OC input from coatings and cleanup materials employed in K001 (Metal Parts Coating Booth), K003 (Metal Parts Coating Booth) and P001 (Solvent Metal Cleaning) combined shall not exceed 126.0 tons per year. The OC input shall be determined by multiplying the number of gallons of each coating and clean-up material employed per month by the OC content of each coating and clean-up material, in pounds per gallon. The OC input of coatings and clean-up materials shall be assumed to be 100 percent of the OC content of the coatings and cleanup materials employed and, as such, is equivalent to the OC emissions rate.

The permittee has existing OC records to demonstrate compliance with the emissions limitation in term and condition B.1 upon permit issuance.

2. The total VOC input from coatings and cleanup materials employed in K001 (Metal Parts Coating Booth), K003 (Metal Parts Coating Booth) and P001 (Solvent Metal Cleaning) shall not exceed 84.0 tons per year. Compliance with the above limitation shall be based on a rolling, 12 month-summation. The VOC input shall be determined by multiplying the number of gallons of each coating and clean-up material employed per month by the VOC content of each coating and clean-up material, in pounds per gallon. The VOC input of coatings and clean-up materials shall be assumed to be 100 percent of the VOC content of the coatings and cleanup materials employed and, as such, is equivalent to the VOC emissions rate.

The permittee has existing VOC records to demonstrate compliance with the emissions limitation in term and condition B.2 upon permit issuance.

C. Monitoring and/or Recordkeeping Requirements

1. This permittee shall collect and record the following information each month for emissions unit K001 (Metal Parts Coating Booth), K003 (Metal Parts Coating Booth) and P001 (Solvent Metal Cleaning), 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.

Emissions Unit ID: **K001**

- d. The VOC content of each coating, in pounds per gallon, as applied.
- e. The total VOC input/emissions from coatings in pounds (b x d).
- f. The VOC content of each coating, in pounds per gallon, excluding water and exempt solvents, as applied.
- g. The name and identification number of each cleanup material employed.
- h. The volume, in gallons, of each cleanup material employed.
- i. The VOC content of each cleanup material employed, in pounds per gallon.
- j. The total VOC input/emissions from cleanup materials employed in pounds (h x i).
- k. The total VOC input/emissions from coatings and cleanup materials employed (e + j).
- l. The OC content of each coating, in pounds per gallon, as applied.
- m. The total OC input/emissions from coatings in pounds (b x l).
- n. The OC content of each cleanup material employed, in pounds per gallon.
- o. The total OC input/emissions from cleanup materials employed in pounds (h x n).
- p. The total OC input/emissions from coatings and cleanup materials employed (m + o).
- q. The updated rolling twelve month total of the total combined VOC from all coating and cleanup material employed in emissions units K001, K003 and P001, in pounds or tons.

In addition, these records shall be summarized at the end of each year to calculate the annual organic compound emissions and solvent usage. The summarized records shall be added to the total usage and emissions from emissions units K001, K003 and P001 to demonstrate compliance with the emissions limitations in Section A.1.

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PTI A**Emissions Unit ID: **K001****Issued: To be entered upon final issuance**

2. The permittee shall collect and record the following information each month for K001 (Metal Parts Coating Booth), K002 (Metal Parts Coating Booth), K003 (Metal Parts Coating Booth) and P001 (Solvent Metal Cleaning) combined:
 - 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

Emissions Unit ID: **K001**

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.

3. The permit to install for emissions units K001 (Metal Parts Coating Booth) and K003 (Metal Parts Coating Booth) combined 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 SCREEN3 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN3 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: Trimethylbenzene

TLV (ug/m3): 122,894

Maximum Hourly Emission Rate (lbs/hr): 36.4

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2196

MAGLC (ug/m3): 2926

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

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- 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 monthly record showing the use of noncomplying coatings, i.e., coating material VOC content limitations in terms A.2.b. through A.2.d. The notification shall include a copy of such record and shall be sent to the Director (the Hamilton County Department of Environmental Services) within 30 days following the end of the calendar month.
2. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month VOC input/emissions limitations set forth in terms B.2. and A.2.f. The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by January 31, April 30, July 31 and

Emissions Unit ID: **K001**

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.

3. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month HAPs emissions limitations set forth in term A.2.e. 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 submit an annual report which identifies the total annual OC input/emissions and annual VOC input/emissions for emissions units K001 (Metal Parts Coating Booth), K003 (Metal Parts Coating Booth) and P001 (Solvent Metal Cleaning), combined for the previous calendar year. This report shall be submitted by January 31 of each year.
5. 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 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emissions Limitation:

49.0 lbs VOC/hour and
49.0 lbs OC/hour.

Applicable Compliance Method:

The hourly VOC and OC emissions limitations shall be determined by multiplying the maximum VOC and OC content as applied (pounds/gallons) by the maximum hourly coating usage rate (gallons/hour) as provided in Permit to Install application 14-05779, received on October 17, 2005.

**Trans
PTI A**Emissions Unit ID: **K001****Issued: To be entered upon final issuance**

b. Emissions Limitation:

84.0 TPY VOC from coatings and cleanup materials employed in emissions units K001 (Metal Parts Coating Booth), K003 (Metal Parts Coating Booth) and P001 (Solvent Metal Cleaning), combined

Applicable Compliance Method:

Compliance shall be determined by summarizing the record keeping required in term and condition C.1.

c. Emissions Limitation:

126.0 TPY OC from coatings and cleanup materials employed in emissions units K001 (Metal Parts Coating Booth), K003 (Metal Parts Coating Booth) and P001 (Solvent Metal Cleaning), combined

Applicable Compliance Method:

Compliance shall be determined by summarizing the record keeping required in term and condition C.1.

d. Emissions Limitations:

The total allowable emission of Hazardous Air Pollutants (HAPs) from the emissions units identified in term and condition A.2.e 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.2.

2. USEPA methods 24 and 24A shall be used to determine the VOC content for coatings. 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 OC and VOC input limitations specified in term and conditions B.1

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and B.2 shall be demonstrated by the record keeping required in term and condition C.1.

F. Miscellaneous Requirements

1. The terms and conditions of this Permit To Install shall supercede the terms and conditions of air PTI 14-05358 issued on November 9, 2002.
2. The following terms and conditions shall be federally enforceable: A, B, C.1-C.2, D, and E.

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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 rule 3745-21-09(U)(1)(d)
K003 - Metal Parts Coating Booth	OAC rule 3745-31-05(A)(3)	OAC rule 3745-21-09(U)(1)(i)
		OAC rule 3745-31-05(C)
		(Synthetic Minor to Avoid Title V and Non-Attainment New Source Review)
	OAC rule 3745-21-09(U)(1)(c)	

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Applicable Emissions
Limitations/Control Measures

Volatile Organic Compound (VOC) emissions from this emissions unit shall not exceed 49.0 lbs/hour, excluding cleanup.

Organic Compound (OC) emissions from this emissions unit shall not exceed 49.0 lbs/hour, excluding cleanup.

OC emissions from emissions units K001, K003 and P001 combined shall not exceed 126.0 tons per year (TPY), including cleanup.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1)(c), OAC rule 3745-21-09(U)(1)(d), OAC rule 3745-21-09(U)(1)(i) and OAC rule 3745-31-05(C).

See term and condition A.2.a and B.1.

See term and condition A.2.b.

See term and condition A.2.c.

See term and condition A.2.d.

See terms and conditions A.2.e, A.2.f, and B.2.

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

- 2.a** The hourly emissions limitations specified for VOC and OC in term and condition A.1. are based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with these limits.
- 2.b** The volatile organic compound (VOC) content for each extreme performance coating employed in this emissions unit shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.
- 2.c** The volatile organic compound (VOC) content for each coating employed in this emissions unit that is dried at temperatures not exceeding two hundred degrees Fahrenheit shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.
- 2.d** The volatile organic compound (VOC) content for each coating employed in this emissions unit that is not regulated under OAC rule 3745-21-09(U)(a) to OAC rule 3745-21-09(U)(h) shall not exceed 3.0 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.
- 2.e** The emissions of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from emissions units K001 (Metal Parts Coating Booth), K002 (Metal Parts Coating Booth), K003 (Metal Parts Coating Booth) and P001 (Solvent Wipe Cleaning) 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 HAPs records to demonstrate compliance with the emissions limitations in term and condition A.2.e upon permit issuance.

- 2.f** The combined annual VOC emissions from emissions units K001 (Metal Parts Coating Booth), K003 (Metal Parts Coating Booth) and P001 (Solvent Metal Cleaning) shall not exceed 84.0 tons per year. Compliance with the above emissions limitation shall be based on a rolling, 12 month-summation.

The permittee has existing VOC records to demonstrate compliance with the emissions limitation in term and condition A.2.f upon permit issuance.

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

limitations.

B. Operational Restrictions

1. The total OC input from coatings and cleanup materials employed in K001 (Metal Parts Coating Booth), K003 (Metal Parts Coating Booth) and P001 (Solvent Metal Cleaning) combined shall not exceed 126.0 tons per year. The OC input shall be determined by multiplying the number of gallons of each coating and clean-up material employed per month by the OC content of each coating and clean-up material, in pounds per gallon. The OC input of coatings and clean-up materials shall be assumed to be 100 percent of the OC content of the coatings and cleanup materials employed and, as such, is equivalent to the OC emissions rate.

The permittee has existing OC records to demonstrate compliance with the emissions limitation in term and condition B.1 upon permit issuance.

2. The total VOC input from coatings and cleanup materials employed in K001 (Metal Parts Coating Booth), K003 (Metal Parts Coating Booth) and P001 (Solvent Metal Cleaning) shall not exceed 84.0 tons per year. Compliance with the above limitation shall be based on a rolling, 12 month-summation. The VOC input shall be determined by multiplying the number of gallons of each coating and clean-up material employed per month by the VOC content of each coating and clean-up material, in pounds per gallon. The VOC input of coatings and clean-up materials shall be assumed to be 100 percent of the VOC content of the coatings and cleanup materials employed and, as such, is equivalent to the VOC emissions rate.

The permittee has existing VOC records to demonstrate compliance with the emissions limitation in term and condition B.2 upon permit issuance.

C. Monitoring and/or Recordkeeping Requirements

1. This permittee shall collect and record the following information each month for emissions unit K001 (Metal Parts Coating Booth), K003 (Metal Parts Coating Booth) and P001 (Solvent Metal Cleaning), 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.

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- d. The VOC content of each coating, in pounds per gallon, as applied.
- e. The total VOC input/emissions from coatings in pounds (b x d).
- f. The VOC content of each coating, in pounds per gallon, excluding water and exempt solvents, as applied.
- g. The name and identification number of each cleanup material employed.
- h. The volume, in gallons, of each cleanup material employed.
- i. The VOC content of each cleanup material employed, in pounds per gallon.
- j. The total VOC input/emissions from cleanup materials employed in pounds (h x i).
- k. The total VOC input/emissions from coatings and cleanup materials employed (e + j).
- l. The OC content of each coating, in pounds per gallon, as applied.
- m. The total OC input/emissions from coatings in pounds (b x l).
- n. The OC content of each cleanup material employed, in pounds per gallon.
- o. The total OC input/emissions from cleanup materials employed in pounds (h x n).
- p. The total OC input/emissions from coatings and cleanup materials employed (m + o).
- q. The updated rolling twelve month total of the total combined VOC from all coating and cleanup material employed in emissions units K001, K003 and P001, in pounds or tons.

In addition, these records shall be summarized at the end of each year to calculate the annual organic compound emissions and solvent usage. The summarized records shall be added to the total usage and emissions from emissions units K001, K003 and P001 to demonstrate compliance with the emissions limitations in Section A.1.

- 2. The permittee shall collect and record the following information each month for K001

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(Metal Parts Coating Booth), K002 (Metal Parts Coating Booth), K003 (Metal Parts Coating Booth) and P001 (Solvent Metal Cleaning) combined:

- 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.

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This information does not have to be kept on a line-by-line basis.

3. The permit to install for this emissions unit K001 (Metal Parts Coating Booth) and K003 (Metal Parts Coating Booth) combined 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 SCREEN3 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN3 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: Trimethylbenzene

TLV (ug/m3): 122,894

Maximum Hourly Emission Rate (lbs/hr): 36.4

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2196

MAGLC (ug/m3): 2926

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

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- 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 monthly record showing the use of noncomplying coatings, i.e., coating material VOC content limitations in terms A.2.b. through A.2.d. The notification shall include a copy of such record and shall be sent to the Director (the Hamilton County Department of Environmental Services) within 30 days following the end of the calendar month.
2. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month VOC input/emissions limitations set forth in terms B.2. and A.2.f. 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

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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.

3. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month HAPs emissions limitations set forth in term A.2.e. 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 submit an annual report which identifies the total annual OC input/emissions and annual VOC input/emissions for emissions units K001 (Metal Parts Coating Booth), K003 (Metal Parts Coating Booth) and P001 (Solvent Metal Cleaning), combined for the previous calendar year. This report shall be submitted by January 31 of each year.
5. 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 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emissions Limitation:

49.0 lbs VOC/hour and
49.0 lbs OC/hour.

Applicable Compliance Method:

The hourly VOC and OC emissions limitations shall be determined by multiplying the maximum VOC and OC content as applied (pounds/gallons) by the maximum hourly coating usage rate (gallons/hour) as provided in Permit to Install application 14-05779, received on October 17, 2005.

- b. Emissions Limitation:

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84.0 TPY VOC from coatings and cleanup materials employed in emissions units K001 (Metal Parts Coating Booth), K003 (Metal Parts Coating Booth) and P001 (Solvent Metal Cleaning), combined

Applicable Compliance Method:

Compliance shall be determined by summarizing the record keeping required in term and condition C.1.

c. Emissions Limitation:

126.0 TPY OC from coatings and cleanup materials employed in emissions units K001 (Metal Parts Coating Booth), K003 (Metal Parts Coating Booth) and P001 (Solvent Metal Cleaning), combined

Applicable Compliance Method:

Compliance shall be determined by summarizing the record keeping required in term and condition C.1.

d. Emissions Limitations:

The total allowable emission of Hazardous Air Pollutants (HAPs) from the emissions units identified in term and condition A.2.e 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.2.

2. USEPA methods 24 and 24A shall be used to determine the VOC content for coatings. 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 OC and VOC input limitations specified in term and conditions B.1 and B.2 shall be demonstrated by the record keeping required in term and condition

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C.1.

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F. Miscellaneous Requirements

1. The terms and conditions of this Permit To Install shall supercede the terms and conditions of air PTI 14-05555 issued on April 22, 2004.
2. The following terms and conditions shall be federally enforceable: A., B., C.1-C.2, D, and E.

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Emissions Unit ID: **P001**

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>
P001 - Solvent metal cleaning	OAC rule 3745-31-05(A)(3)	The Organic Compound (OC) emissions shall not exceed 1344.0 lbs/day.
		OC emissions from emissions units K001, K003 and P001 combined shall not exceed 126.0 tons per year (TPY), including cleanup.
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C) and OAC rule 3745-21-09(O).
	OAC rule 3745-31-05(C) Synthetic Minor to Avoid Title V and Non-Attainment New Source Review	See terms and conditions A.2.c, and B.5 through B.7.
		See terms A.2.b and A.2.d.
	OAC rule 3745-21-09(O)	See terms B.2 through B.4.
	40CFR63 Subpart T	See term B.1.

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Emissions Unit ID: **P001**

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

2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the material usage limitations, the OC content limitations and the emissions limitations.

2.b The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units K001 (Metal Parts Coating Booth), K002 (Metal Parts Coating Booth), K003 (Metal Parts Coating Booth) and P001 (Solvent Metal Cleaning) 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 the rolling, 12-month summation limit upon issuance of the permit.

2.c The organic compound (OC) content of any cleanup solvent employed in this emissions unit shall not exceed 8.0 pounds per gallon.

2.d The combined annual VOC emissions from emissions units K001 (Metal Parts Coating Booth), K003 (Metal Parts Coating Booth) and P001 (Solvent Metal Cleaning) shall not exceed 84.0 tons per year. Compliance with the above emissions limitation shall be based on a rolling, 12 month-summation.

The permittee has existing VOC records to demonstrate compliance with the emissions limitation in term and condition A.2.d upon permit issuance.

B. Operational Restrictions

1. The use of halogenated cleaning solvents, as specified in 40 CFR 63.460, in this emissions unit is prohibited.
2. The permittee shall operate this emissions unit according to either term B.2.a or B.2.b below:
 - a. The cold cleaner shall be operated with a cover.
 - b. The cold cleaner shall employ a remote solvent reservoir from which solvent is pumped through a nozzle suspended over a sink-like work area which drains back to the reservoir, provided the sink-like area has an open drain area of less than 16 square inches and provided the solvent neither is heated above 120

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degrees Fahrenheit nor has a vapor pressure greater than 0.6 pound per square inch absolute, measured at 100 degrees Fahrenheit.

3. The cold cleaner shall be equipped with a device for draining the cleaned parts; and if the solvent has a vapor pressure greater than 0.6 pound per square inch absolute, measured at 100 degrees Fahrenheit, the drainage facility shall be constructed internally so that parts are enclosed under the cover during draining, unless an internal type drainage device cannot fit into the cleaning system.
4. The cold cleaner shall be operated and maintained in accordance with the following practices to minimize solvent evaporation from the unit:
 - a. Provide a permanent, legible, conspicuous label, summarizing the operating requirements.
 - b. Store waste solvent in covered containers.
 - c. Close the cover whenever parts are not being handled in the cleaner.
 - d. Drain the cleaned parts until dripping ceases.
 - e. If used, supply a solvent spray that is a solid fluid stream (not a fine, atomized, or shower-type spray) at a pressure that does not exceed 10 pounds per square inch gauge.
 - f. Clean only materials that are neither porous nor absorbent.
5. The maximum daily organic cleaning solvent usage in emissions unit P001 shall not exceed 1344.0 pounds per day.
6. The total OC input from coatings and cleanup materials employed in K001 (Metal Parts Coating Booth), K003 (Metal Parts Coating Booth) and P001 (Solvent Metal Cleaning) combined shall not exceed 126.0 tons per year. The OC input shall be determined by multiplying the number of gallons of each coating and clean-up material employed per month by the OC content of each coating and clean-up material, in pounds per gallon. The OC input of coatings and clean-up materials shall be assumed to be 100 percent of the OC content of the coatings and cleanup materials employed and, as such, is equivalent to the OC emissions rate.

The permittee has existing OC records to demonstrate compliance with the emissions limitation in term and condition B.6 upon permit issuance.

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7. The total VOC input from coatings and cleanup materials employed in K001 (Metal Parts Coating Booth), K003 (Metal Parts Coating Booth) and P001 (Solvent Metal Cleaning) shall not exceed 84.0 tons per year. Compliance with the above limitation shall be based on a rolling, 12 month-summation. The VOC input shall be determined by multiplying the number of gallons of each coating and clean-up material employed per month by the VOC content of each coating and clean-up material, in pounds per gallon. The VOC input of coatings and clean-up materials shall be assumed to be 100 percent of the VOC content of the coatings and cleanup materials employed and, as such, is equivalent to the VOC emissions rate.

The permittee has existing VOC records to demonstrate compliance with the emissions limitation in term and condition B.7 upon permit issuance.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. The company identification for each cleaning solvent employed that contains VOC.
 - b. The vapor pressure of each solvent, in pound per square inch absolute, measured at 100 degrees Fahrenheit.
 - c. The number of pounds of VOC in each cleaning solvent employed that contains VOC and the amount of cleaning solvent employed.
2. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. The company identification for each organic cleaning solvent employed.
 - b. A record of each organic cleaning solvent employed in this emissions unit indicating, whether or not the liquid organic material is a halogenated cleaning solvent, as specified in 40 CFR 63.460
 - c. The number of pounds of each organic cleaning solvent employed.
 - d. The organic compound content of each organic cleaning solvent employed, in percent by weight.

- e. The total organic compound emission rate for all organic cleaning solvents employed, in pounds per day [calculated by taking the sum of (c) times (d) for each organic cleaning solvent employed].

In addition, these records shall be summarized at the end of each year to calculate the annual organic compound emissions and solvent usage. The summarized records shall be added to the total usage and emissions from emissions units K001 and K003 to demonstrate compliance with the emissions limitations in Section A.1.

3. The permittee shall collect and record the following information each month from emissions units K001 (Metal Parts Coating Booth), K002 (Metal Parts Coating Booth), K003 (Metal Parts Coating Booth) and P001 (Solvent Wipe Cleaning):
 - a. The name and identification number of each coating, as applied.
 - 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 cleaning material employed.
 - f. The individual HAP content for each HAP of each cleaning material in pounds of individual HAP per gallon of cleaning material, as applied.
 - g. The total combined HAP content of each cleaning material in pounds of combined HAPs per gallon of cleaning material, as applied [sum all the individual HAP contents from (f)].
 - h. The number of gallons of each cleaning material employed.
 - i. The total individual HAP emissions for each HAP from all coatings and cleaning 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 cleaning material].
 - j. The total combined HAP emissions from all coatings and cleaning materials

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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 cleaning material].

- k. The updated rolling, 12-month summation for individual HAP emissions for each HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
- l. The updated rolling, 12-month summation for total combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

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. This permittee shall collect and record the following information each month for emissions unit K001 (Metal Parts Coating Booth), K003 (Metal Parts Coating Booth) and P001 (Solvent Metal Cleaning), 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 input/emissions from coatings in pounds (b x d).
 - f. The VOC content of each coating, in pounds per gallon, excluding water and exempt solvents, as applied.
 - g. The name and identification number of each cleanup material employed.
 - h. The volume, in gallons, of each cleanup material employed.
 - i. The VOC content of each cleanup material employed, in pounds per gallon.
 - j. The total VOC input/emissions from cleanup materials employed in pounds (h x i).

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- k. The total VOC input/emissions from coatings and cleanup materials employed (e + j).
 - l. The OC content of each coating, in pounds per gallon, as applied.
 - m. The total OC input/emissions from coatings in pounds (b x l).
 - n. The OC content of each cleanup material employed, in pounds per gallon.
 - o. The total OC input/emissions from cleanup materials employed in pounds (h x n).
 - p. The total OC input/emissions from coatings and cleanup materials employed (m + o).
 - q. The updated rolling twelve month total of the total combined VOC from all coating and cleanup material employed in emissions units K001, K003 and P001, in pounds or tons.
5. The permit to install for this emissions unit (P001) was evaluated based on the actual materials (typically coatings and cleaning 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 SCREEN3 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN3 model was compared to the Maximum Ground-Level Concentration (MAGLC).

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

Pollutant: Acetone

TLV (ug/m3): 1,187,117

Maximum Hourly Emission Rate (lbs/hr): 56.0

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 2741

MAGLC (ug/m3): 28,265

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 cleaning 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

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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 of any exceedance of the rolling, 12-month HAP emissions limitations set forth in term A.2.b. 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.

2. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of either of the rolling, 12-month VOC input and/or emissions limitations set forth in terms A.2.d and B.7. 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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3. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services which specify the annual organic compounds usage, in pounds, and the total organic compounds emissions from emissions units K001, K003 and P001 for the previous calendar year. These reports shall be submitted by January 31 of each year.
4. The permittee shall submit a deviation report to the Hamilton County Department of Environmental Services identifying each day during which any halogenated cleaning solvent, as specified in 40 CFR 63.460 was employed and/or the OC content of any cleaning solvent exceeded 8.0 pounds of OC per gallon in this emissions unit.
5. The permittee shall submit a deviation report to the Hamilton County Department of Environmental Services identifying each day during which the usage limitation of 1344 pounds per day in term B.5 was exceeded.
6. Unless specified, 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 outlined in term A. and B. of these terms and conditions shall be demonstrated in accordance with the following method(s):
 - a. Emissions Limitations:
1344.0 lbs OC/day; and
126.0 TPY OC from K001, K003 and P001 combined.

Applicable Compliance Method:
Compliance with the lbs of OC/day limitation shall be demonstrated through the monitoring and record keeping required in term and condition C.2.

Compliance with the TPY of OC limitation shall be demonstrated through the monitoring and record keeping required in term and condition C.4.
 - b. Emissions Limitations:
84.0 TPY of VOC from K001, K003 and P001 combined

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Applicable Compliance Method:

Compliance shall be demonstrated through the monitoring and record keeping required in term and condition C.4.

2. Compliance with the HAP emission limitations outlined in term and condition A.2.b shall be demonstrated by the record keeping in term and condition C.3.
3. Compliance with the usage limitations in terms and conditions B.6 and B.7 shall be demonstrated by the record keeping in term and condition C.4.
4. Compliance with the usage limitations in terms and conditions B.5 shall be demonstrated by the record keeping in term and condition C.1.
5. Compliance with the OC content limitation in term and condition A.2.c shall be demonstrated by the record keeping in term and condition C.2.

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6. Compliance with the limitation on the use of halogenated cleaning solvents, as specified in 40 CFR 63.460 in term and condition B.1 shall be demonstrated by the record keeping in term and condition C.2.

F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A, B, C.1, C.2, C.3, C.4, D, and E.