State of Ohio Environmental Protection Agency

RE: FINAL PERMIT TO INSTALL **CERTIFIED MAIL**
HAMILTON COUNTY

Street Address: Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329 Mailing Address: Lazarus Gov. Center

Application No: 14-04987

DATE: 12/28/2000

Steelcraft Div of Ingersoll Rand Co
Leon H Van Derzee
9017 Blue Ash Road
Cincinnati, OH 45242

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, buy 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 by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 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. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo

Thomas G. Rigo
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA **HCDES**

FINAL PERMIT TO INSTALL 14-04987

Application Number:	14-04987
APS Premise Number:	1431050879
Permit Fee:	**$200**
Name of Facility:	Steelcraft Div of Ingersoll Rand Co
Person to Contact:	Leon H Van Derzee
Address:	9017 Blue Ash Road Cincinnati, OH 45242

Location of proposed air contaminant source(s) [emissions unit(s)]:
9017 Blue Ash Road
Cincinnati, Ohio

Description of proposed emissions unit(s):
Modification of Grain Tech Paint Line.

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. State and Federally Enforceable Permit To Install General Terms and Conditions

1. Monitoring and Related Recordkeeping and Reporting Requirements

a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

i. The date, place (as defined in the permit), and time of sampling or measurements.

ii. The date(s) analyses were performed.

iii. The company or entity that performed the analyses.

iv. The analytical techniques or methods used.

v. The results of such analyses.

vi. The operating conditions existing at the time of sampling or measurement.

b. 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.

c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

ii. Quarterly written reports of (i) any deviations from federally enforceable <u>emission limitations</u>, <u>operational restrictions</u>, <u>and control device operating parameter limitations</u>, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written 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. See B.11 below if no deviations occurred during the quarter.

iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. 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, i.e., upset, 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. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

6. General Requirements

a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d. This permit does not convey any property rights of any sort, or any exclusive privilege.

e. 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 request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. 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.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

a. Any document (including reports) required to be submitted and required by a federally

applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.

iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

10. Permit To Operate Application

a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete

Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35 , the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. 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 thirty (30) days after commencing operation of the source(s) covered by this permit.

B. State Only Enforceable 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 Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping of state-only enforceable 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 state-only required 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. 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.

4. 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.

5. 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.

6. 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 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 are inadequate 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 prove to be inadequate or cannot meet applicable standards.

7. 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.

8. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

9. 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.

10. 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.

11. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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.

C. 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

Pollutant	Tons Per Year
VOC	15.82
PM/PM10	2.33

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

None

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. 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	Applicable Rules/Requirements	
K010 - Miscellaneous Metal Parts Paint Line - **Modification**	OAC rule 3745-31-05(A)(3)	OAC rule 3745-17-07(A) OAC rule 3745-17-11(B)
	OAC rule 3745-31-05(D)	
	OAC rule 3745-21-09(U)(1)(a)	
	OAC rule 3745-21-09(U)(1)(c)	

Applicable Emissions Limitations/Control Measures	
312 lbs/day VOC, 0.53* lbs/hr PM/PM10, 2.33 TPY PM/PM10 See term A.I.2.2.a See term A.II.1 The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A), OAC rule 3745-21-09(U)(1)(c) and OAC rule 3745-31-05(D). * The hourly PM/PM10 emission limitation is based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly and daily records are required to demonstrate compliance with these limits.	See T&C A.I.2.2.a , for coating material See T&C A.I.2.2.b The emissions limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
15.82 TPY VOC based on a rolling, 12-month summation See T&C A.I.2.2.c See T&C A.II.2 The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).	

2. Additional Terms and Conditions

2.a The volatile organic compound (VOC) content, as applied of each coating employed in emissions unit K010 shall not exceed the following limits, excluding water and exempt solvents:

Material	VOC Content lbs/gal
Clearcoat	4.1
Coating Material*	3.5**
Cleanup Material	7.5

* includes primer, finish paint and stain
* *VOC content limit is based upon a daily volume-weighted average

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

2.c The actual usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this emissions unit 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.

* This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.

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

2.d Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by VOC content limits, material usage limits, the use of dry filters to control particulate and compliance with Ohio's Air Toxic Policy.

II. Operational Restrictions

1. The maximum daily material usage rate for this emissions unit shall not exceed the following:

Material	Gallons/Day*
Clearcoat	20
Coating Material**	55
Cleanup Material	5

* excluding water and exempt solvents
** includes primer, finish paint and stain

2. The maximum annual material usage rate for this emissions unit shall not exceed the following, based upon a rolling, 12-month summation of the material usage figures:

Material	Gallons/Year*
Clearcoat	3150
Coating Material**	4385
Cleanup Material	450

* excluding water and exempt solvents
** includes primer, finish paint and stain

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records which list the following information for each clearcoat, coating material and cleanup material employed in emissions unit K010:

   a. The name and identification number of each clearcoat, coating material* and cleanup material employed.

b. The VOC content of each clearcoat, coating material* and cleanup material (excluding water and exempt solvents), as applied.

c. The daily volume-weighted average VOC content, as applied, for all coating materials* calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for $C_{voc,2}$.

d. The name and identification of each cleanup material employed.

e. The VOC content of each cleanup material, in pounds per gallon.

f. The number of gallons (excluding water and exempt solvents) of each coating employed.

g. The number of gallons of each cleanup material employed.

h. The total VOC emissions from all coatings and cleanup materials employed, in pounds or tons [(b x f) + (e x g)].

* includes primer, finish paint and stain

2. The permittee shall maintain monthly records of the following information:

   a. The usage for each clearcoat, coating material* and cleanup material.

   b. The rolling 12-month summation for each clearcoat, coating material* and cleanup material.

   * includes primer, finish paint and stain

3. The permittee shall collect and record the following information each month for this emissions unit:

   a. The name and identification number of each clearcoat, and coating material employed;

   b. The individual Hazardous Air Pollutant (HAP)** content for each HAP of each clearcoat, and coating material* in pounds of individual HAP per gallon of coating, as applied;

   c. The total combined HAP content of each clearcoat and coating material 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 clearcoat and coating material* employed;

   e. The name and identification of each cleanup material employed;

   f. The individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;

   g. The total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied [sum all the individual HAP contents from (f)];

   h. The number of gallons of each cleanup material employed;

   i. The total individual HAP usage for each HAP from all clearcoat, coating material* and cleanup material employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each coating plus the sum of (f) times (h) for each cleanup material];

   j. The total combined HAP usage from all clearcoat, coating material* and cleanup material 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 cleanup material];

k. The updated rolling, 12-month summation of usage for each individual HAP***, in pounds or tons. This shall include the information for the current month and the preceding eleven calender months; and

l. The updated rolling, 12-month summation of usage for total combined HAP***, in pounds or tons. This shall include the information for the current month and the preceding eleven calender months.

* includes primer, finish paint and stain

** A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.

*** This assumes the HAP(s) emitted are the same as the amounts of HAP(s) used since all HAP(s) used evaporated.

IV. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing an exceedance of the clearcoat, coating material* and/or cleanup material VOC content limitation or daily material usage limitation. 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.

   * includes primer, finish paint and stain

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month material usage limitation in term A.II.2.

3. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the actual usage of HAP limitations set forth in term A.I.2.2.c. The permittee shall submit annual reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year. If no exceedances occurred during the reporting period then a report is required stating so.

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

5. The permittee shall submit annual reports which specify the total VOC emissions from this

emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the emission limitation in Section A.I.2.2.a of these terms and conditions shall be determined in accordance with the following method(s):

   VOC Content Limitation:

   The volatile organic compound (VOC) content of coating materials employed in emissions unit K010 shall not exceed the following when calculated <u>excluding water and exempt solvents</u>:

Material	VOC Content lbs/gal
Clearcoat	4.1
Coating Material*	3.5**
Cleanup Material	7.5

* includes primer, finish paint and stain
* * VOC content limit is based upon a daily volume weighted average.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section III. In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, 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.

The daily volume weighted average shall be calculated by multiplying the VOC content by the usage amount for all coating materials employed during that day. The summation of these values should then be divided by the total gallons of coating materials employed during that day.

2. Emission Limitation:

312 lbs/day VOC, 15.82 TPY VOC

Applicable Compliance Method:

Compliance with the above VOC emission limitations shall be determined by using the following equations:

Lbs/day VOC = (A) x (B)
Ton/yr VOC = (B) x (C) x 0.0005

Where:

A = daily clearcoat, coating material and cleanup material usage, in gallons as applied, excluding water and exempt solvents
B = VOC content of clearcoat, coating material and cleanup material, lbs/gal, as applied,

excluding water and exempt solvents
C = annual clearcoat, coating material and cleanup material usage in gallons, as applied, excluding water and exempt solvents

3. Compliance with the HAP emission limitations in term A.I.2.2.c shall be determined by the Recordkeeping in Section A.III.3.

4. Compliance with the usage limit in Section A.II.1 & 2 shall be determined by the Recordkeeping in Section A.III.1.

5. Particulate Emission Limitation

   0.53 lb/hr PM/PM10

   Compliance with the above PM/PM10 emission limitation shall be determined by using the following equation:

   Lb/hr PM /PM10= A x B x C x(1-D) x (1-E)

   Where:

   A = Hourly clearcoat, and coating material* usage, in gallons per hour
   B = Solids content, in pounds of solids per pounds of material
   C = Material density in pounds of material per gallon of material
   D = Transfer efficiency of .65 , based on large metal parts
   E = Control efficiency of .95 , based on dry filter

VI. Miscellaneous Requirements

1. The terms and conditions listed in this permit to install shall supercede all the air pollution control requirements for this emission unit contained in permit to install 14-4069 as issued on August 21, 1996.

Emissions Unit ID: K010

B. State Only Enforceable Section

I. 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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K010 - Miscellaneous Metal Parts Paint Line - **Modification**	Air Toxics Policy	See T&C B.III.1.

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for emissions unit K010 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

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

   Pollutant: 2-butoxy ethanol

   TLV (ug/m3): 96,663

   Maximum Hourly Emission Rate (lbs/hr): 22.875

   Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1683

MAGLC (ug/m3): 2302

Physical changes to or in the method of operation of the emissions unit after it's installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled: and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s)to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], 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 it's 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.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Emissions Unit ID: K010

NEW SOURCE REVIEW FORM B

PTI Number: 14-04987 Facility ID: 1431050879

FACILITY NAME Steelcraft Div of Ingersoll Rand Co

FACILITY DESCRIPTION Modification of Grain Tech Paint Line CITY/TWP Cincinnati

SIC CODE 3442 SCC CODE 402-02-501 EMISSIONS UNIT ID K010

EMISSIONS UNIT DESCRIPTION Miscellaneous Metal Parts Paint Line - Modification

DATE INSTALLED

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	attainment	0.53 lb/hr	2.33	0.53 lb/hr	2.33
PM_{10}	attainment	0.53 lb/hr	2.33	0.53 lb/hr	2.33
Sulfur Dioxide					
Organic Compounds	attainment	312 lbs/day	15.82	312 lbs/day	15.82
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by VOC content limits, material usage limits, the use of dry filters to control particulate and compliance with Ohio's Air Toxic Policy.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? $NA

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES ____ NO

IDENTIFY THE AIR CONTAMINANTS: 2-butoxy ethanol

Emissions Unit ID: K010

NEW SOURCE REVIEW FORM B

PTI Number: 14-04987 Facility ID: 1431050879

FACILITY NAME Steelcraft Div of Ingersoll Rand Co

FACILITY DESCRIPTION Modification of Grain Tech Paint Line CITY/TWP Cincinnati

Ohio EPA Permit to Install Information Form Please describe below any documentation which is being submitted with this recommendation (must be sent the same day). Electronic items should be submitted with the e-mail transmitting the PTI terms, and in software that CO can utilize. If mailing any hard copy, this section must be printed as a cover page. All items must be clearly labeled indicating the PTI name and number. Submit hard copy items to **Pam McGraner**, AQM&P, DAPC, Central Office, and electronic files to **airpti@epa.state.oh.us**

Please fill out the following. If the checkbox does not work, replace it with an 'X'	Electronic	**Additional information** File Name Convention (your PTI # plus this letter)	Hard Copy	None
Calculations (required)	☐	0000000**c**.wpd	☒	☐
Modeling form/results	☐	0000000**s**.wpd	☒	☐
PTI Application (complete or partial)*	☐	0000000**a**.wpd	☐	☒
BAT Study	☐	0000000**b.**wpd	☐	☒
Other/misc.	☐	0000000**t**.wpd	☐	☒

* Mandatory for netting, PSD, nonattainment NSR, 112(g), 21-07(G)(9)(g) and 21-09(U)(2)(f) - 2 complete copies.

Please complete (see comment bubble to the left for additional instructions):

NSR Discussion

PTI 14-04987

Steelcraft Div. of Ingersoll-Rand Company
9017 Blue Ash Road
Cincinnati, Ohio 45242

Premise Number: 1431050879

Steelcraft Div. Ingersoll-Rand Company is a manufacturer of steel doors and frames. This permit application is a modification to PTI 14-4069. The emission unit is one miscellaneous metal parts paint line. The permittee wishes to increase the VOC content of the coatings employed in this paint line. The permittee is a Title V facility. On the Title V Compliance Certification report filed in April of 2000, the permittee stated that they had miscalculated the VOC content of the stain on the original PTI submittal. The actual VOC content was higher than that allowed by PTI 14-4069. The daily and annual VOC emissions limit was not exceeded. Our office sent the permittee a NOV. The submittal and issuance of this PTI will bring them into compliance.

Emissions will be VOC and particulate. Particulate emissions were not addressed in PTI 14-4069 but are addressed in this PTI because the permittee is a Title V facility. VOC emissions are calculated as 312 lb/day and 15.82 TPY. Particulate emissions are calculated as 0.53 lb/hr and 2.33 TPY.

The applicable Ohio Administrative Code (OAC) regulations are: 3745-31-05(A)(3) , 3745-15-07, and 3745-21-09(U)(1)(a),(c), 3745-17-07(A), 3745-31-05(D) and 3745-17-11. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by VOC content limits, material usage limits, the use of dry filters to control particulate and compliance with Ohio's Air Toxic Policy.

Toxic screening was reevaluated with the new hourly limit. Modeling indicates that air toxics are within the acceptable

Emissions Unit ID: K010

NEW SOURCE REVIEW FORM B

PTI Number: 14-04987 Facility ID: 1431050879

FACILITY NAME Steelcraft Div of Ingersoll Rand Co

FACILITY DESCRIPTION Modification of Grain Tech Paint Line CITY/TWP Cincinnati

range.

Permit Fee = $200

Please complete for these type permits (For PSD/NSR Permit, place mouse over this text):

☒ **Synthetic Minor Determination and/or** ☐ **Netting Determination**

Permit To Install **14-04987**

A. Source Description

Steelcraft Ingersoll-Rand Company is a manufacturer of steel doors and frames. The facility has applied for a Permit to Install modification for emissions unit K010, one miscellaneous metal parts paint line.

B. Facility Emissions and Attainment Status

Steelcraft Ingersoll-Rand Company is classified as a major facility for Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs). The facility is located in Hamilton County which is designated as attainment for ozone. The annual VOC emissions will be limited to 15.82 TPY For this emissions unit, HAPs emissions will be limited to 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs.

C. Source Emissions

The proposed permit to install application limits the emission rate to 312 pounds of VOC per day and 15.82 tons of VOC per year. The uncontrolled emissions would be 56.94 tons per year VOC. The proposed permit to install application limits the emission rate to 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. The worst case uncontrolled HAP emissions would be 29.41 tons per year. The permit to install will contain terms and conditions to limit the material usage rate. The maximum annual material usage rate will be based on a rolling, 12-month summation. Compliance with the HAPs limitation will be based on a rolling, 12-month summation.

D. Conclusion

The terms and conditions in this Permit to Install will limit the coating and cleanup material usage rate so that the emissions will not exceed 15.82 tons of VOC per year and 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Steelcraft Ingersoll-Rand Company will maintain daily records of the total coating and cleanup material usage as outlined in the additional terms and conditions and submit semi-annual reports to assure compliance. The facility will emit less than the major stationary source significant emission rate of 40 tons per year of VOC, therefore, the emissions unit will not be subject to Prevention of Significant Deterioration (PSD) regulations. This emissions unit will emit less than 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, therefore a case by case MACT determination is not needed.

PLEASE PROVIDE ADDITIONAL NOTES OR COMMENTS AS NECESSARY:

NONE

Please complete:

SUMMARY (for informational purposes only)

Emissions Unit ID: K010

NEW SOURCE REVIEW FORM B

PTI Number: 14-04987 Facility ID: 1431050879

FACILITY NAME Steelcraft Div of Ingersoll Rand Co

FACILITY DESCRIPTION Modification of Grain Tech Paint Line CITY/TWP Cincinnati

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons Per Year
VOC	15.82
PM/PM10	2.33