



State of Ohio Environmental Protection Agency

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

**CERTIFIED MAIL**

Street Address:

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

Mailing Address:

Lazarus Gov. Center

**Application No: 14-05562**

**DATE: 6/22/2004**

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

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 **\$200** 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.

Very truly yours,

*Michael W. Ahern*

Michael W. Ahern, Supervisor  
Field Operations and Permit Section  
Division of Air Pollution Control

CC: USEPA HCDDES Ohio-Kentucky-Indiana Reg Council of Governments KY IN



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**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 14-05562**

Application Number: 14-05562  
APS Premise Number: 1431050879  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: Steelcraft Div of Ingersoll Rand Co  
Person to Contact: Leon 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):

**Waterbase Adhesive Coating 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 Record keeping 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 record keeping 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 emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and record keeping 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.9 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, record keeping, 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

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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

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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 ninety (90) days after commencing operation of the source(s) covered by this permit.

#### **11. 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.

#### **12. 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.

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**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**

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or record keeping 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 record keeping 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. 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

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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.

**5. 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 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.

**6. 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.

**7. 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.

**8. Construction Compliance Certification**

If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form

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if applicable) 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.

**9. 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**

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	1.22
Organic HAP	1.22
PM/PM <sub>10</sub>	2.41

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**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
K011 - Waterbase adhesive coating line for doors	OAC rule 3745-31-05(A)(3)	OAC rule 3745-17-11
	OAC rule 3745-21-09(U)(1)	
	40 CFR 63 Subpart Mmmm, for Coating Miscellaneous Metal Parts and Products - Section 63.3890	
	40 CFR 63 Subpart Mmmm, for Coating Miscellaneous Metal Parts and Products - Section 63.3900-63.3963	
	OAC rule 3745-17-07(A)(1)	

Applicable Emissions  
Limitations/Control  
Measures

9.8 lbs VOC/day  
1.22 TPY VOC  
1.22 TPY organic HAP  
0.551 lb PM<sub>10</sub>/hour  
2.41 TPY PM/PM<sub>10</sub>

See terms and conditions  
A.I.2.a & b and A.II.1 -  
A.II.3.

The requirements of this rule  
also include compliance with  
the requirements of OAC  
rule 3745-17-07(A)(1) and  
40 CFR  
Part 63, Subpart M

The emission limitation  
specified by this rule is less  
stringent than the emission  
limitation established  
pursuant to OAC rule  
3745-31-05(A)(3).

The emission limitation  
specified by this rule is less  
stringent than the emission  
limitation established  
pursuant to OAC rule  
3745-31-05(A)(3).

See term and condition  
A.II.4.

Visible particulate emissions  
from any stack shall not  
exceed 20 percent opacity,

as a six-minute average, except as  
specified by rule.

0.551 lb PM/hour

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- 2.a** The volatile organic compound (VOC) content of each coating employed in this emissions unit shall not exceed 0.47 pound of VOC per gallon of coating, excluding water and exempt solvents, as applied.
- 2.b** The organic HAP content of each coating employed in this emissions unit shall not exceed 0.50 pound of organic HAP per gallon of coating solids.
- 2.c** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by coating and cleanup material usage restrictions, VOC and HAP content limitations and emissions limitations, and compliance with the requirements of 40 CFR 63 Subpart Mmmm, for Coating Miscellaneous Metal Parts and Products.

**II. Operational Restrictions**

- 1.** The maximum daily coating usage for this emissions unit shall not exceed 20.8 gallons per day, excluding water and exempt solvents.
- 2.** The maximum annual coating usage for this emissions unit shall not exceed 5200 gallons per year, excluding water and exempt solvents.
- 3.** The permittee shall employ only water for cleanup materials in this emissions unit.
- 4.** The permittee shall employ only non-HAP containing material as thinners, additives, and cleanup materials in this emissions unit per the requirements of 40 CFR 63.3891.

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

- 1.** The permittee shall collect and record the following information each day for emissions unit K011:
  - a.** The name and identification number of each coating, additive and thinner employed;
  - b.** The volume, in gallons, of each coating, additive and thinner employed, excluding water and exempt solvents, as applied;
  - c.** The VOC content of each coating, in pounds per gallon, excluding water and exempt solvents, as applied;
  - d.** The total VOC emission rate for all coatings (including thinners and additives) employed,

in pounds per day [(b x c)].

2. The permittee shall collect and record the following information each year for emissions unit K011:
  - a. The annual sum of all daily emissions, in pounds or tons per year [the sum of A.III.1.d. for each day of the calendar year].
3. For each day during which the permittee employs a cleanup material other than a non-HAP material and other than water, the permittee shall maintain a record of the type and quantity of cleanup material employed in this emissions unit. The permittee shall maintain records of the date, time, and duration of each deviation.
4. The permittee shall collect and keep records of the following data and information. Failure to collect and keep these records is a deviation from the applicable standard.
  - a. A copy of each notification and report that the permittee submitted to comply with this subpart and the documentation supporting each notification and report.
  - b. A current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP and density for each coating, thinner and/or other additive, and cleaning material, and the volume fraction of coating solids for each coating. If the permittee conducted testing to determine mass fraction of organic HAP, density, or volume fraction of coating solids, a copy of the complete test report must be kept. If the permittee uses information provided by the manufacturer or supplier of the material that was based on testing, the permittee must keep the summary sheet of results provided by the manufacturer or supplier. The permittee is not required to obtain the test report or other supporting documentation from the manufacturer or supplier.
  - c. A semi-annual record of the coating operations on which the permittee used each compliance option and the time periods (beginning and ending dates and times) for each option the permittee used.
  - d. A semi-annual record of the calculation of the organic HAP content for each coating, using Equation 2 of 40 CFR 63.3941. The permittee shall determine the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during the compliance period by using one of the options in paragraphs (a)(1) through (5) of section 40 CFR 63.3941. The permittee shall determine the volume fraction of coating solids [liters (gal) of coating solids per liter (gal) of coating] for each coating used during the compliance period by a test, by information provided by the supplier or the manufacturer of the material, or by calculation, as specified in paragraphs (b)(1) through (4) of section 40 CFR 63.3941.

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- e. The organic HAP emissions on a ton per year basis shall be calculated using the organic HAP content for each coating and the total gallons of each coating employed during the period.

Records must be in a form suitable and readily available for expeditious review, according to 40 CFR 63.10(b)(1). Where appropriate, the records may be maintained as electronic spreadsheets or as a database. As specified in 40 CFR 63.10(b)(1), the permittee shall keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

As specified in 40 CFR 63.10(b)(1), the permittee must keep each record on-site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record according to 40 CFR 63.10(b)(1). The permittee may keep the records off-site for the remaining 3 years.

**IV. Reporting Requirements**

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any record showing the use of noncomplying coatings and/or cleanup materials (i.e., for VOC contents or non-HAP, non-water cleanup material) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month. The notification shall include the calculation of the daily VOC emission rate for day exceeding the applicable maximum daily coating usage limit.
3. The permittee shall submit annual reports which summarize the following for this emissions unit:
  - a. The total VOC emissions from coatings employed in this emissions unit for the previous calendar year.
  - b. The total number of gallons of coatings employed, excluding water and exempt solvents in this emissions unit for the previous calendar year.
  - c. The total number of gallons of non-HAP and non-water cleanup materials employed in this

emissions unit for the previous calendar year.

The reports shall be submitted by January 31 of each year.

4. The permittee shall submit semi-annual reports that contain information specified in paragraphs (a)(3)(i) through (vii) of 40 CFR 63.3920, and the information specified in paragraphs (a)(4) through (7) and (c)(1) of this section that is applicable to your affected source, including:
  - a. Company name and address.
  - b. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.
  - c. Date of report and beginning and ending dates of the reporting period. The reporting period is the 6-month period ending on June 30 or December 31. Note that the information reported for each of the 6 months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.
  - d. Identification of the compliance option or options specified in 40 CFR 63.3891 that you used on each coating operation during the reporting period. If you switched between compliance options during the reporting period, you must report the beginning and ending dates for each option you used.
  - e. Deviation (excursion) reports that identify any deviation from the applicable organic HAP content requirements in term and condition A.I.2.b. The semiannual compliance report must contain the information in paragraphs 40 CFR 63.3890(a)(5)(i) through (iv) of this section as outlined below:
    - i. An identification of each coating used that deviated from the applicable emission limit, and each thinner and/or other additive, and cleaning material used that contained organic HAP, and the dates and time periods each was used.
    - ii. The calculation of the organic HAP content (using Equation 2 of 40 CFR 63.3941) for each coating identified in paragraph (a)(5)(i) of this section. You do not need to submit background data supporting this calculation (*e.g.*, information provided by coating suppliers or manufacturers, or test reports).
    - iii. The determination of mass fraction of organic HAP for each thinner and/or other

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additive, and cleaning material identified in paragraph (a)(5)(i) of this section. You do not need to submit background data supporting this calculation (*e.g.*, information provided by material suppliers or manufacturers, or test reports).

- iv. A statement of the cause of each deviation.

If there were no deviations from the emission limitations in term and condition A.I.2.b. and 40 CFR 63.3892 and 63.3893 that apply to the permittee, the semiannual compliance report must include a statement that there were no deviations from the emission limitations during the reporting period. The semi-annual reporting periods are from January 1 through June 30 or from July 1 through December 31, and may be submitted consistent with Title V operating permit semi-annual report due dates (i.e. January 31 and July 31).

- 5. The permittee shall submit a notification of compliance status which contains the information outlined in 40 CFR 63.3910(c). This report must be submitted within 30 calendar days of the initial compliance period as described in 40 CFR 63.3940 unless it has previously been submitted.

**V. Testing Requirements**

- 1. Emissions Limitations

9.8 lbs VOC/day from the application of coatings

Applicable Compliance Method

Compliance with the daily VOC emissions limitations shall be demonstrated by the record keeping requirement in terms and conditions A.III.1.

- 2. Emissions Limitations

1.22 TPY VOC from the application of coatings

Applicable Compliance Method

Compliance with the annual VOC emissions limitations shall be demonstrated by a summation of the daily VOC emissions as recorded in terms and conditions A.III.1 for coatings materials and the summation divided by 2000 pounds, such that the summation equal Tons per Year (TPY) VOC emissions.

### 3. Emissions Limitations

0.47 pound of VOC per gallon of coating, excluding water and exempt solvents, as applied.

#### Applicable Compliance Method

USEPA methods 24 and 24A shall be used to determine the VOC content for coatings and cleanup materials, respectively. If, pursuant to 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or cleanup material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

### 4. Material Usage Limitations

20.8 gallons of coatings per day, excluding water and exempt solvents;  
5200 gallons of coatings per year, excluding water and exempt solvents;  
Restricted cleanup material usage to water and non-HAP materials.

#### Applicable Compliance Method

Compliance with the material usage limitations in terms and conditions A.II.1 through A.II.4 shall be demonstrated by the record keeping in terms and conditions A.III.1 and A.III.3.

### 5. HAPs Emissions Limits

0.50 pound of organic HAP/ gallon of coating solids

#### Applicable Compliance Method

Compliance with the organic HAP content limit shall be demonstrated by the record keeping outlined in section A.III.4. for organic HAP content and the use of thinner and/or other additives, and cleaning materials that contain no organic HAPs. Manufacturer's formulation data and purchase records may be used to demonstrate HAP content compliance.

The permittee must meet all the requirements of 40 CFR 63.3940, 63.3941, and 63.3942 to demonstrate compliance with the applicable emission limit using this option.

- a. Determination of the mass fraction of organic HAP for each material used.

The permittee shall determine the mass fraction of organic HAP for each coating, thinner and/or

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other additive, and cleaning material used during the compliance period by using one of the options in paragraphs (a)(1) through (5) of section 40 CFR 63.3941.

- b. Determination of the volume fraction of coating solids for each coating

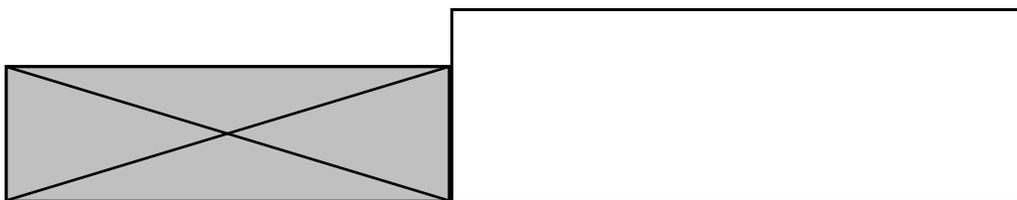
The permittee shall determine the volume fraction of coating solids [liters (gal) of coating solids per liter (gal) of coating] for each coating used during the compliance period by a test, by information provided by the supplier or the manufacturer of the material, or by calculation, as specified in paragraphs (b)(1) through (4) of section 40 CFR 63.3941.

- c. Determination of the density of each coating.

The permittee shall determine the density of each coating used during the compliance period from test results using ASTM Method D1475–98, "Standard Test Method for Density of Liquid Coatings, Inks, and Related Products" (incorporated by reference, see §63.14), information from the supplier or manufacturer of the material, or specific gravity data for pure chemicals. If there is disagreement between ASTM Method D1475–98 test results and the supplier's or manufacturer's information, the test results will take precedence unless, after consultation the permittee demonstrate to the satisfaction of the enforcement agency that the formulation data are correct.

- d. Determination the organic HAP content of each coating.

Calculate the organic HAP content, kg (lb) of organic HAP emitted per liter (gal) coating solids used, of each coating used during the compliance period using Equation 2 of this section:



Where:

$H_c$  = Organic HAP content of the coating, kg organic HAP emitted per liter (gal) coating solids used.  $D_c$  = Density of coating, kg coating per liter (gal) coating, determined according to paragraph (c) of this section.  $W_c$  = Mass fraction of organic HAP in the coating, kg organic HAP per kg coating, determined according to paragraph (a) of this section.  $V_s$  = Volume fraction of coating solids, liter (gal) coating solids per liter (gal) coating, determined according to paragraph (b) of this section.

6. Emissions Limitations

1.22 TPY organic HAP

Applicable Compliance Method

Compliance with the annual organic HAP emissions limitation shall be demonstrated by a summation of the multiplication of the organic HAP content for each coating by the number of gallons of each coating employed during the year and divided by 2000 pounds, such that the summation equal Tons per Year (TPY) organic HAP emissions.

7. Compliance during the initial compliance period.

The initial compliance period begins on the applicable compliance date specified in 40 CFR 63.3883 and ends on the last day of the 12th month following the compliance date. If the compliance date occurs on any day other than the first day of a month, then the initial compliance period extends through that month plus the next 12 months. The initial compliance demonstration includes the calculations according to 40 CFR 63.3941 and supporting documentation showing that during the initial compliance period, the permittee used no coating with an organic HAP content that exceeded the applicable emission limit in term and condition A.I.2.b, and that the permittee used no thinners and/or other additives, or cleaning materials that contained organic HAP as determined according to 40 CFR 63.3941(a).

**VI. Miscellaneous Requirements**

None

Steelc

PTI A

Emissions Unit ID: **K011**

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**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K011 - Waterbase adhesive coating line for doors		

**2. Additional Terms and Conditions**

**2.a** None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**NEW SOURCE REVIEW FORM B**

PTI Number: 14-05562 Facility ID: 1431050879

FACILITY NAME Steelcraft Div of Ingersoll Rand Co

FACILITY DESCRIPTION Waterbase Adhesive Coating Line CITY/TWP Cincinnati

SIC CODE 3442 SCC CODE 4-02-025-01 EMISSIONS UNIT ID K011

EMISSIONS UNIT DESCRIPTION Waterbase adhesive coating line for doors

DATE INSTALLED 7/04

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					
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds	non-attainment	9.8 lbs./day	1.22	9.8 lbs/day	1.22
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics	toluene	9.8 lbs./day	1.22	9.8 lbs/day	1.22

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? MMMM 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 coating and cleanup material usage restrictions, VOC and HAP content limitations, emissions limitations and compliance with the MACT rule Subpart MMMM.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No - MACT applicability

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\*? \_\_\_\_\_ YES X NO

IDENTIFY THE AIR CONTAMINANTS: \_\_\_\_\_