



State of Ohio Environmental Protection Agency

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

**CERTIFIED MAIL**

Street Address:

50 West Town Street, Suite 700

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

Mailing Address:

Lazarus Gov. Center  
P.O. Box 1049

**Application No: 14-05897**

**Fac ID: 1431050879**

**DATE: 10/4/2007**

Steelcraft Div of Ingersoll Rand Co  
Paul Schubert  
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, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

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

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

Sincerely,

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

CC: USEPA

HCDES



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**FINAL PERMIT TO INSTALL 14-05897**

Application Number: 14-05897  
Facility ID: 1431050879  
Permit Fee: **\$400**  
Name of Facility: Steelcraft Div of Ingersoll Rand Co  
Person to Contact: Paul Schubert  
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):  
**Changing from non-complying to complying coatings in use for emission units K003 and K010.**

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



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Chris Korleski  
Director

## Part I - GENERAL TERMS AND CONDITIONS

### 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 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 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

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the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted (i.e., postmarked) quarterly, 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, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency every six months, 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. If this permit is for an emissions unit located at a Title V facility, then 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.
- d. The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

## 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 re-issuance, or modification
- 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, 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 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.

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## **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 any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

## **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 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 and the State and by citizens (to the extent allowed by section 304 of the Act) 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 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.

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**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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### **13. Permit-To-Install**

A permit-to-install must be obtained pursuant to OAC Chapter 3745-31 prior to "installation" of "any air contaminant source" as defined in OAC rule 3745-31-01, or "modification", as defined in OAC rule 3745-31-01, of any emissions unit included in this permit.

## **B. State Only Enforceable Permit-To-Install General Terms and Conditions**

### **1. Compliance Requirements**

The emissions unit(s) identified in this Permit 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 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 (i.e., postmarked) quarterly, 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.

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The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

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#### **4. Authorization To Install or Modify**

If applicable, authorization to install or modify any new or existing emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit 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.

#### **5. Construction of New Sources(s)**

This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. 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 this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit 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 application must be made to the Director for the installation or modification of any other emissions unit(s).

#### **8. Construction Compliance Certification**

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	29.66
PE	4.8

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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**

- 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 - (K003) - Miscellaneous Metal Parts Paint Booth**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>Volatile organic compounds (VOC) emissions from the application of coatings, clear coatings, and cleanup materials shall not exceed 351.82 pounds per day (lb/day).</p> <p>See term and condition A.I.2.d.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1), OAC rule 3745-31-05(C) and 40 CFR Part 63, Subpart Mmmm.</p>
OAC rule 3745-31-05(C) to avoid non-attainment new source review	<p>VOC emissions shall not exceed 13.61 tons per year (TPY) from the application of coatings and cleanup material used in this emissions unit, based on a rolling, 12-month summation.</p> <p>See terms and conditions A.II.1 through A.II.3.</p>
OAC rule 3745-21-09(U)(1)(a)	See term and condition A.I.2.b.
OAC rule 3745-21-09(U)(1)(d)	See term and condition A.I.2.c.
40 CFR Part 63, Subpart Mmmm	<p>See 40 CFR Part 63.3890.</p> <p>Organic hazardous air pollutants (HAP) emissions shall not exceed 2.6 lbs per gallon (lb/gal) during each 12-month compliance period.</p> <p>See term and condition A.I.2.e.</p>
OAC rule 3745-17-11(B)	Particulate emissions (PE) shall not exceed 0.551 pound per hour.

ORC 3704.03(T)(4)	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions (PE), particulate matter emissions 10 microns and less in diameter (PM10) or particulate matter emissions 2.5 microns and less in diameter (PM2.5) from this air contaminant source because the calculated annual emission rate for PE, PM10 and PM2.5 is less than ten tons per year, taking into account the federally enforceable rule limit of 0.551 lb of PE per hour under OAC rule 3745-17-11(B).
OAC rule 3745-17-07(A)(1)	The visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.

**2. Additional Terms and Conditions**

- 2.a** The daily VOC emission limitation outlined above is based upon the emissions unit's Potential to Emit (PTE). Therefore, no daily records are required to demonstrate compliance with these limitations.

(Authority for Term: OAC rule 3745-31-05(A)(3))
- 2.b** The VOC content for each clear coating employed in this emissions unit shall not exceed 4.3 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.

(Authority for Term: OAC rule 3745-21-09(U)(1)(a))
- 2.c** The 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.

(Authority for Term: OAC rule 3745-21-09(U)(1)(d))
- 2.d** The VOC content for each cleanup material employed in this emissions unit shall not exceed 7.3 pounds of VOC per gallon of cleanup material.

(Authority for Term: OAC rule 3745-31-05(A)(3))
- 2.d** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emission limitations, OC content limitations and usage limitations.
- 2.e** Compliance with 40 CFR Part 63, Subpart Mmmm shall be demonstrated by one of the compliance options listed in 40 CFR Part 63, Subpart Mmmm, section

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63.3891.

## II. Operational Restrictions

1. The amount of coating used in this emissions unit shall not exceed 4500 gallons excluding water and exempt solvents per year. Compliance with the above limitation shall be based on a rolling, 12 month-summation. The permittee has existing records to demonstrate compliance with this limitation upon permit issuance.

(Authority for Term: OAC rule 3745-31-05(C))

2. The amount of clear coating used in this emissions unit shall not exceed 1880 gallons excluding water and exempt solvents per year. Compliance with the above limitation shall be based on a rolling, 12 month-summation. The permittee has existing records to demonstrate compliance with this limitation upon permit issuance.

(Authority for Term: OAC rule 3745-31-05(C))

3. The amount of cleanup material used in this emissions unit shall not exceed 450 gallons per year. Compliance with the above limitation shall be based on a rolling, 12 month-summation. The permittee has existing records to demonstrate compliance with this limitation upon permit issuance.

(Authority for Term: OAC rule 3745-31-05(C))

## III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the emission unit:
  - a. the name and identification number of each coating and cleanup material;
  - b. the VOC content of each cleanup material, as applied;
  - c. the VOC content of each coating material used, excluding water and exempt solvents, as applied.;
  - d. the number of gallons of each coating, excluding water and exempt solvents, as applied and cleanup material employed;

Emissions Unit ID: K003

- e. the updated rolling twelve month total combined coatings, in gallons excluding water and exempt solvents, as applied and cleanup materials employed, in gallons; and
- f. the updated rolling twelve month total combined VOC emissions from all coatings and cleanup materials employed, in tons.

(Authority for Term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-31-05(C))

2. See 40 CFR Part 63, Subpart Mmmm (40 CFR 63.3881-3981).

#### IV. 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 or cleanup materials. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month in which the use of noncomplying coatings was recorded.

(Authority for Term: OAC rule 3745-21-09(B)(3))

2. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month VOC emission limitation set forth in term and condition A.I.1 or the coating or cleanup usage limitation in terms and conditions A.II.1, A.II.2, and A.II.3. 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.

(Authority for Term: OAC rule 3745-31-05(C))

3. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services quantifying the total VOC emissions from this emissions unit and the number of gallons of coating, excluding water and exempt solvents, as applied and cleanup materials used from this emissions unit. This report is due by January 31 of each year and shall cover the previous calendar year.

(Authority for Term: OAC rule 3745-31-05(C))

4. See 40 CFR Part 63, Subpart Mmmm (40 CFR 63.3881-3981)

#### V. Testing Requirements

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

- a. Emission Limitation:  
Volatile organic compounds (VOC) emissions from the application of coatings, clear coatings, and cleanup material shall not exceed 351.82 pounds per day (lb/day).

Applicable Compliance Method:

Compliance with the above VOC daily emission limitation shall be determined by multiplying the VOC content of the coating, clear coating, and cleanup material, excluding water and exempt solvents, as applied by the daily usage rate, excluding water and exempt solvents, as applied.

(Authority for Term: OAC rule 3745-31-05(A)(3))

- b. Emission Limitation:  
VOC emissions shall not exceed 13.61 tons per year (TPY) from the application of coatings and cleanup material used in this emissions unit, based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the above VOC annual emission limitation shall be determined by multiplying the VOC content of the coating, clear coating, and cleanup materials by each of their respective annual usage rates. This amount is then divided by 2,000 pounds to convert to tons of VOC per year. The tons of VOC per rolling, 12-month from the coating, clear coating, and cleanup material are then added together to give the total tons of VOC per year.

(Authority for Term: OAC rule 3745-31-05(C))

- c. Emission Limitation:  
The VOC content for each clear coating employed in this emissions unit shall not exceed 4.3 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.

The 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.

Emissions Unit ID: K003

The VOC content for each cleanup material employed in this emissions unit shall not exceed 7.3 pounds of VOC per gallon of cleanup material.

Applicable Compliance Method:

If required, USEPA methods 24 and 24A shall be used to determine the VOC content for coatings. If, pursuant 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 procedures or alternative precision statements for Method 24 or 24A.

(Authority for Term: OAC rule 3745-21-09(U)(1)(a), OAC rule 3745-21-09(U)(1)(d))

- d. Emission Limitation:  
Particulate emissions (PE) shall not exceed 0.551 pound per hour.

Applicable Compliance Method:

The hourly PE rate limitation is based on Table 1 in OAC rule 3745-17-11.

To determine the worst case PE rate, the following equation shall be used:

$E = \text{maximum coating solids usage rate, in pounds per hour,} \times (1-TE) \times (1-CE)$

where  $E = \text{PE rate (lbs/hr)}$ ;

$TE = \text{fractional transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (0.55)}$ ;  
and

$CE = \text{fractional control efficiency of the control equipment (0.99)}$ .

When requested by the Ohio EPA, the permittee shall demonstrate compliance with the above emissions limitation pursuant to OAC rule 3745-17-03(B)(10).

(Authority for Term: OAC rule 3745-17-11(B))

- e. Emission Limitation:  
Organic hazardous air pollutants (HAP) emissions shall not exceed 2.6 lb per gallon (lb/gal) during each 12-month compliance period.

Applicable Compliance Method:

See 40 CFR Part 63, Subpart M (40 CFR 63.3881-3981)

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- f. Emission Limitation:  
Visible particulate emissions shall not exceed 20 percent opacity, as a six-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1).

- g. Emission Limitation:  
The controlled potential to emit for PE, PM10 and PM2.5 is less than ten tons per year.

Applicable Compliance Method:

The annual PE, PM10 and PM2.5 emission rate is based on this emission unit's potential to emit. The annual PE, PM10 and PM2.5 emission rate is calculated by multiplying the maximum hourly emission rate by 8760 hours per year/2000 pounds per ton. The PM10 and PM2.5 emission rates are assumed to be less than or equal to the PE rate.

- 2. Compliance with the requirements of terms and conditions A.II.1, A.II.2, and A.II.3 shall be demonstrated by the record keeping required in term and condition A.III.1.

(Authority for Term: OAC rule 3745-31-05(C))

## **VI. Miscellaneous Requirements**

- 1. The terms and conditions of this air permit to install shall supercede the terms and conditions of air permit to install number 14-05277 issued on June 11, 1996.

Emissions Unit ID: K003

**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 - (K003) - Miscellaneous Metal Parts Paint Booth**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
None	None

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

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**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 - (K010) - Miscellaneous Metal Parts Paint Line**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>Volatile organic compounds (VOC) emissions from the application of coatings, clear coatings, and cleanup materials shall not exceed 351.82 pounds per day (lb/day).</p> <p>See term and condition A.I.2.d.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1), OAC rule 3745-31-05(C) and 40 CFR Part 63, Subpart Mmmm.</p>
OAC rule 3745-31-05(C) to avoid non-attainment new source review	<p>VOC emissions shall not exceed 16.05 tons per year (TPY) from the application of coatings and cleanup material used in this emissions unit, based on a rolling, 12-month summation.</p> <p>See terms and conditions A.II.1 through A.II.3.</p>
OAC rule 3745-21-09(U)(1)(a)	See term and condition A.I.2.b.
OAC rule 3745-21-09(U)(1)(d)	See term and condition A.I.2.c.
40 CFR Part 63, Subpart Mmmm	<p>See 40 CFR Part 63.3890.</p> <p>Organic hazardous air pollutants (HAP) emissions shall not exceed 2.6 lbs per gallon (lb/gal) during each 12-month compliance period.</p> <p>See term and condition A.I.2.e.</p>
OAC rule 3745-17-11(B)	Particulate emissions (PE) shall not exceed 0.551 pound per hour.

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ORC 3704.03(T)(4)	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions (PE), particulate matter emissions 10 microns and less in diameter (PM10) or particulate matter emissions 2.5 microns and less in diameter (PM2.5) from this air contaminant source because the calculated annual emission rate for PE, PM10 and PM2.5 is less than ten tons per year, taking into account the federally enforceable rule limit of 0.551 lb of PE per hour under OAC rule 3745-17-11(B).
OAC rule 3745-17-07(A)(1)	The visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.

## 2. Additional Terms and Conditions

- 2.a** The daily VOC emission limitation outlined above is based upon the emissions unit's Potential to Emit (PTE). Therefore, no daily records are required to demonstrate compliance with these limitations.

(Authority for Term: OAC rule 3745-31-05(A)(3))

- 2.b** The VOC content for each clear coating employed in this emissions unit shall not exceed 4.3 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.

(Authority for Term: OAC rule 3745-21-09(U)(1)(a))

- 2.c** The 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.

(Authority for Term: OAC rule 3745-21-09(U)(1)(d))

- 2.d** The VOC content for each cleanup material employed in this emissions unit shall not exceed 7.3 pounds of VOC per gallon of cleanup material.

(Authority for Term: OAC rule 3745-31-05(A)(3))

- 2.d** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by

Emissions Unit ID: K010

compliance with the emission limitations, OC content limitations and usage limitations.

- 2.e** Compliance with 40 CFR Part 63, Subpart M MMM shall be demonstrated by one of the compliance options listed in 40 CFR Part 63, Subpart M MMM, section 63.3891.

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## II. Operational Restrictions

1. The amount of coating used in this emissions unit shall not exceed 5500 gallons excluding water and exempt solvents per year. Compliance with the above limitation shall be based on a rolling, 12 month-summation. The permittee has existing records to demonstrate compliance with this limitation upon permit issuance.

(Authority for Term: OAC rule 3745-31-05(C))

2. The amount of clear coating used in this emissions unit shall not exceed 2200 gallons excluding water and exempt solvents per year. Compliance with the above limitation shall be based on a rolling, 12 month-summation. The permittee has existing records to demonstrate compliance with this limitation upon permit issuance.

(Authority for Term: OAC rule 3745-31-05(C))

3. The amount of cleanup material used in this emissions unit shall not exceed 450 gallons per year. Compliance with the above limitation shall be based on a rolling, 12 month-summation. The permittee has existing records to demonstrate compliance with this limitation upon permit issuance.

(Authority for Term: OAC rule 3745-31-05(C))

## III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the emission unit:
  - a. the name and identification number of each coating and cleanup material;
  - b. the VOC content of each cleanup material, as applied;
  - c. the VOC content of each coating material used, excluding water and exempt solvents, as applied.;
  - d. the number of gallons of each coating, excluding water and exempt solvents, as applied and cleanup material employed;
  - e. the updated rolling twelve month total combined coatings, in gallons excluding water and exempt solvents, as applied and cleanup materials employed, in

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gallons; and

- f. the updated rolling twelve month total combined VOC emissions from all coatings and cleanup materials employed, in tons.

(Authority for Term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-31-05(C))

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2. See 40 CFR Part 63, Subpart Mmmm (40 CFR 63.3881-3981).

#### **IV. 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 or cleanup materials. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month in which the use of noncomplying coatings was recorded.

(Authority for Term: OAC rule 3745-21-09(B)(3))

2. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month VOC emission limitation set forth in term and condition A.I.1 or the coating or cleanup usage limitation in terms and conditions A.II.1, A.II.2, and A.II.3. 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.

(Authority for Term: OAC rule 3745-31-05(C))

3. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services quantifying the total VOC emissions from this emissions unit and the number of gallons of coating, excluding water and exempt solvents, as applied and cleanup materials used from this emissions unit. This report is due by January 31 of each year and shall cover the previous calendar year.

(Authority for Term: OAC rule 3745-31-05(C))

4. See 40 CFR Part 63, Subpart Mmmm (40 CFR 63.3881-3981)

#### **V. Testing Requirements**

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

Emissions Unit ID: K010

- a. Emission Limitation:  
Volatile organic compounds (VOC) emissions from the application of coatings, clear coatings, and cleanup material shall not exceed 351.82 pounds per day (lb/day).
- Applicable Compliance Method:  
Compliance with the above VOC daily emission limitation shall be determined by multiplying the VOC content of the coating, clear coating, and cleanup material, excluding water and exempt solvents, as applied by the daily usage rate, excluding water and exempt solvents, as applied.
- (Authority for Term: OAC rule 3745-31-05(A)(3))
- b. Emission Limitation:  
VOC emissions shall not exceed 16.05 tons per year (TPY) from the application of coatings and cleanup material used in this emissions unit, based on a rolling, 12-month summation.
- Applicable Compliance Method:  
Compliance with the above VOC annual emission limitation shall be determined by multiplying the VOC content of the coating, clear coating, and cleanup materials by each of their respective annual usage rates. This amount is then divided by 2,000 pounds to convert to tons of VOC per year. The tons of VOC per rolling, 12-month from the coating, clear coating, and cleanup material are then added together to give the total tons of VOC per year.
- (Authority for Term: OAC rule 3745-31-05(C))
- c. Emission Limitation:  
The VOC content for each clear coating employed in this emissions unit shall not exceed 4.3 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.
- The 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.
- The VOC content for each cleanup material employed in this emissions unit shall not exceed 7.3 pounds of VOC per gallon of cleanup material.
- Applicable Compliance Method:  
If required, USEPA methods 24 and 24A shall be used to determine the VOC content for coatings. If, pursuant 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

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use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

(Authority for Term: OAC rule 3745-21-09(U)(1)(a), OAC rule 3745-21-09(U)(1)(d))

- d. Emission Limitation:  
Particulate emissions (PE) shall not exceed 0.551 pound per hour.

Applicable Compliance Method:

The hourly PE rate limitation is based on Table 1 in OAC rule 3745-17-11.

To determine the worst case PE rate, the following equation shall be used:

$E = \text{maximum coating solids usage rate, in pounds per hour,} \times (1-TE) \times (1-CE)$

where  $E = \text{PE rate (lbs/hr)}$ ;

$TE = \text{fractional transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (0.55)}$ ; and

$CE = \text{fractional control efficiency of the control equipment (0.99)}$ .

When requested by the Ohio EPA, the permittee shall demonstrate compliance with the above emissions limitation pursuant to OAC rule 3745-17-03(B)(10).

(Authority for Term: OAC rule 3745-17-11(B))

- e. Emission Limitation:  
Organic hazardous air pollutants (HAP) emissions shall not exceed 2.6 lb per gallon (lb/gal) during each 12-month compliance period.

Applicable Compliance Method:

See 40 CFR Part 63, Subpart M (40 CFR 63.3881-3981)

- f. Emission Limitation:  
Visible particulate emissions shall not exceed 20 percent opacity, as a six-minute average, except as provided by the rule.

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**Applicable Compliance Method:**

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1).

**g. Emission Limitation:**

The controlled potential to emit for PE, PM10 and PM2.5 is less than ten tons per year.

**Applicable Compliance Method:**

The annual PE, PM10 and PM2.5 emission rate is based on this emission unit's potential to emit. The annual PE, PM10 and PM2.5 emission rate is calculated by multiplying the maximum hourly emission rate by 8760 hours per year / 2000 pounds per ton. The PM10 and PM2.5 emission rates are assumed to be less than or equal to the PE rate.

2. Compliance with the requirements of terms and conditions A.II.1, A.II.2, and A.II.3 shall be demonstrated by the record keeping required in term and condition A.III.1.

(Authority for Term: OAC rule 3745-31-05(C))

**VI. Miscellaneous Requirements**

1. The terms and conditions of this air permit to install shall supercede the terms and conditions of air permit to install number 14-04987 issued on December 28, 2000.

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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.

**Operations, Property, and/or Equipment - (K010) - Miscellaneous Metal Parts Paint Line**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
None	None

2. **Additional Terms and Conditions**

- 2.a None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None