

Synthetic Minor Determination and/or **Netting Determination**
Permit To Install **14-05592**

A. Source Description

Trans-Acc has proposed to increase the emissions for each booth except K006 which now qualifies for de minimus. This facility coats miscellaneous metal parts, much of which are for the military.

B. Facility Emissions and Attainment Status

Trans-Acc is located in Hamilton County, Ohio. Hamilton County is designated as attainment for PM/PM10, SO₂, and CO and non-attainment for VOC and NO_x.

C. Source Emissions

The VOC emissions for emissions units K001, K002, K003, K004 and K007 will be limited to 21.0 lbs/day and 2.63 TPY VOC, each. The VOC emissions for emissions units K005 and K008 will be limited to 434.5 lbs VOC per day and 31.5 TPY VOC, each. Without federally enforceable terms and conditions, Trans-Acc could potentially emit over 10 tons per year of any one Hazardous Air Pollutant (HAP) and more than 25 tons per year of any combination of HAPs for the entire facility. The facility also has potential VOC emissions greater than 100 TPY.

Through this synthetic minor Permit to Install (PTI), Trans-Acc will be limited to 9.9 tons per year of any one HAP and 24.9 tons per year of any combination of HAPs. Compliance with the limitations will be demonstrated by recording the coating usage and the VOC and HAP content of each coating employed.

D. Conclusion

Through this synthetic minor PTI, Trans-Acc will be limited to 9.9 tons per year of any one HAP and 24.9 tons per year of any combination of HAPs. The facility VOC emissions will be limited to less than 100 TPY so the facility will not be major.

Since the potential emissions of HAPs are less than 10 tons per year of any one HAP and 25 tons per year for any combination of HAPs, and the VOC emissions are less than 100 TPY, Trans-Acc is not considered a major facility for MACT, Emissions Offset are Title V permitting.



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: 14-05592

Fac ID: 1431050909

DATE: 11/4/2004

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

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$1700** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

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

CC: USEPA

HCDES

Ohio-Kentucky-Indiana Regional Council of Governments

KY

IN

HAMILTON COUNTY

PUBLIC NOTICE

**ISSUANCE OF DRAFT PERMIT TO INSTALL 14-05592 FOR AN AIR CONTAMINANT SOURCE FOR
Trans - Acc., Inc.**

On 11/4/2004 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Trans - Acc., Inc.**, located at **11167 Deerfield Road, Cincinnati**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 14-05592:

Modification to 7 Paint Spray Booths.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Brad Miller, Hamilton County Department of Environmental Services, 250 William Howard Taft Pkwy,
Cincinnati, OH 45219-2660 [(513)946-7777]



**Permit To Install
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 14-05592

Application Number: 14-05592
Facility ID: 1431050909
Permit Fee: **To be entered upon final issuance**
Name of Facility: Trans - Acc., Inc.
Person to Contact: Andrew Slonkosky
Address: 11167 Deerfield Road
Cincinnati, OH 452422094

Location of proposed air contaminant source(s) [emissions unit(s)]:
**11167 Deerfield Road
Cincinnati, Ohio**

Description of proposed emissions unit(s):
Modification to 7 Paint Spray Booths.

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

Trans - Acc., Inc.

Facility ID: 1431050909

PTI Application: 14-05592

Issued: To be entered upon final issuance

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any

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information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

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

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

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

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental 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.

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

10. Public Disclosure

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

11. Applicability

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

12. Best Available Technology

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

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

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

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14. Construction Compliance Certification

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

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	76.15

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K001 - Paint Line 2 (Modification of an existing emissions unit installed in 1968 that trigger an new air PTI)	OAC rule 3745-31-05(A)(3)	OC emissions shall not exceed 21.0 lbs/day, excluding cleanup See terms and conditions A.2.a, A.2.d and B.1. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e)(ii) and OAC rule 3745-31-05(C).
	OAC rule 3745-31-05(C)	OC emissions shall not exceed 2.63 tons per year (TPY), excluding cleanup, based upon a rolling, 12-month summation. See terms and conditions A.2.b. and B.1.
	OAC rule 3745-21-07(G)(2)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-09(U)(2)(e)(ii)	See term and condition B.2.

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Trans - Acc., Inc.
PTI Application: 14-05502
Issued

Facility ID: 1431050909

Emissions Unit ID: **K001**

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

- 2.a** The OC content, as applied, of each coating employed in this emissions unit shall not exceed 7.0 pounds of OC per gallon of coating.
- 2.b** The total allowable emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units K001 (Paint Line 2), K002 (Paint Line 4), K003 (Paint Line 5), K004 (Paint Line 6), K005 (Paint Line 7), K006 (Miscellaneous Metal Parts Paint Booth), K007 (Paint Line 3), K008 (Paint Line 8), P002 (Automatic Binks Paint Machine) and P005 (Facility-wide Miscellaneous Solvent Use) shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation. The permittee has existing records to demonstrate compliance with the rolling, 12-month summation limit upon issuance of the permit.
- 2.c** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the OC content limitation, the OC emissions limitations and the OC input limitations.
- 2.d** Organic compound (OC) emissions shall not exceed 8 lbs/hr when applying coatings identified as Photochemically Reactive Materials (PRM) to non-metal parts which are not oven-cured.

B. Operational Restrictions

- 1. The maximum daily OC input of coatings employed in emissions unit K001 shall not exceed 21.0 pounds per day, as applied. The maximum annual OC input of coatings employed in emissions unit K001 shall not exceed 5,250 pounds per year based upon a rolling, 12-month summation, as applied. The OC input shall be determined by multiplying the number of gallons of coating employed per month by the OC content of each coating, in pounds per gallon. The OC input rate of coatings employed is based upon the premise that 100% of the solvent contained within the coatings is emitted. Note any OC emissions from clean-up materials are permitted under air PTI 14-05438 in emissions unit P005. The permittee has existing records to demonstrate compliance with the rolling, 12-month summation limit upon issuance of the permit.
- 2. The maximum daily coating usage for this emissions unit shall not exceed 3 gallons per day when coating miscellaneous metal parts.

C. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall collect and record the following information each day for emissions unit K001:

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- a. the name and identification number of each coating;
- b. the volume, in gallons, of each coating employed on miscellaneous metal parts, and the volume, in gallons, of each coating employed on non-metal parts;
- c. the total volume, in gallons, of all of the coatings employed;
- d. the OC content of each coating applied to miscellaneous metal parts, in pounds OC per gallon of coating, as applied;
- e. the OC content of each coating applied to miscellaneous metal and non-metal parts, in pounds OC per gallon of coating, as applied;
- f. the OC emissions from the application of coatings, in pounds OC per day [the summation of b. multiplied by e. for the coating(s) employed in K001]; and
- g. a record of each coating employed in this emissions unit indicating, whether or not the coating is photochemically reactive as identified in OAC rule 3745-21-01(C)(5).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

2. The permittee shall maintain monthly records of the total OC input, in pounds, of all coatings employed in this emissions unit and the updated rolling, 12-month summation of the total OC input and emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
3. The permittee shall collect and record the following information for each hour when applying coatings identified as Photochemically Reactive Materials (PRMs) on non-metal parts in emissions unit K001:
 - a. the company identification for each coating employed;
 - b. for each day during which a photochemically reactive material is employed, the volume, in gallons, of each coating, each hour of the day;
 - c. the OC content of each coating, in pounds OC per gallon of coating, as applied; and
 - d. for each hour during which a photochemically reactive material is employed, the total OC emission rate for all coatings, in pounds per hour (b. multiplied by c. for the non-metal

PRM coating(s) employed in K001).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically" are based upon OAC rule 3745-21-01(C)(5)].

4. The permittee shall collect and record the following information each month for emission units K001 (Paint Line 2), K002 (Paint Line 4), K003 (Paint Line 5), K004 (Paint Line 6), K005 (Paint Line 7), K006 (Miscellaneous Metal Parts Paint Booth), K007 (Paint Line 3), K008 (Paint Line 8), P002 (Automatic Binks Paint Machine) and P005 (Facility-wide Miscellaneous Solvent Use):
 - a. the name and identification number of each coating, employed;
 - b. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
 - c. the total combined HAP content of each coating in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (b)];
 - d. the number of gallons of each coating employed;
 - e. the name and identification of each cleanup material employed;
 - f. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;
 - g. the total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied [sum all the individual HAP contents from (f)];
 - h. the number of gallons of each cleanup material employed;
 - i. the total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each coating plus the sum of (f) times (h) for each cleanup material];
 - j. the total combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material];
 - k. the updated rolling, 12-month summation of emissions for each individual HAP, in pounds or tons. This shall include the information for the current month and the

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preceding eleven calendar months; and

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

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

5. The permit to install for this emissions unit (K001) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

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

Pollutant: Diethylenetriamine

TLV (ug/m3): 4,200

Maximum Hourly Emission Rate (lbs/hr): 0.1664

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 92

MAGLC (ug/m3): 100

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

- a. changes in the composition of the materials used, or the use of new materials, that would

Emissions Unit ID: **K001**

result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is(are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation reports which identify any exceedance of the HAP emission limitations set forth in term and condition A.2.b.

The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous three calendar months (October through December, January through March, April through June and July through September, respectively.)

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If no exceedances occurred, the permittee shall state so in the report.

2. The permittee shall notify the Hamilton County Department of Environmental Services of any daily record showing that emissions unit K001 employed coatings that exceeded the applicable maximum OC content limits outlined in term and condition A.2.a. A copy of such record shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance(s) occurred.
3. The permittee shall notify the Hamilton County Department of Environmental Services of any daily record showing that emissions unit K001 employed more than the applicable maximum daily OC input limit outlined in term and condition B.1. A copy of such record shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurred.
4. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage as outlined in term and condition B.2. (i.e., the maximum daily coating usage for this emissions unit shall not exceed 3 gallons per day when coating miscellaneous metal parts). The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.
5. The permittee shall notify the Hamilton County Department of Environmental Services of any daily record showing an identification of each hour during which the organic compound emissions from the non-metal parts coatings when applying photochemically reactive materials exceeded 8 pounds per hour, and the actual organic compound emissions for each such hour.

A copy of such record shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance(s) occurred.

6. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services which specify the total OC emissions from emissions unit K001 for the previous calendar year. These reports shall be submitted by January 31 of each year.
7. The permittee shall submit quarterly deviation reports which identify any exceedance of the rolling, 12-month OC input limitation in term B.1.

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.

E. Testing Requirements

1. Compliance with the emission limitations and other limitations in term and conditions A. and B. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emissions Limitation

8 lbs OC emissions/hr when applying PRM coatings on non-metal parts

Applicable Compliance Method

Compliance with the hourly OC emissions limitation shall be demonstrated by the record keeping requirement in term and condition C.3.
 - b. Emissions Limitation

21.0 lbs OC emissions/day

Applicable Compliance Method

Compliance with the daily OC emissions limitation shall be demonstrated by the record keeping requirement in term and condition C.1.
 - c. Emissions Limitation

2.63 tons per year (TPY) OC emissions, based upon a rolling, 12-month summation

Applicable Compliance Method

Compliance with the annual OC emissions limitation shall be demonstrated by the record keeping requirement in term and condition C.2.
 - d. OC Content Limitation

7.0 pounds OC per gallon of coating, of each coating applied to metal parts

Applicable Compliance Method

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USEPA methods 24 and 24A shall be used to determine the OC 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.

e. Material Usage Limitations

21.0 pounds per day OC input
5,250 pounds per year OC input;

Applicable Compliance Method

Compliance with the OC input limitations in terms and conditions B.1 shall be demonstrated by the record keeping in terms and conditions C.1 and C.2..

f. Emission Limitation:

9.9 TPY for any single HAP and 24.9 TPY for combined HAPs from the facility per term and condition A.2.b.

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Applicable Compliance Method:

Compliance with the HAP emission limitations will be determined by the record keeping requirements specified in term and condition C.4.

2. Compliance with the coating usage limitation in term and condition B.2. shall be determined by the record keeping requirements as specified in term and condition C.1.

F. Miscellaneous Requirements

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

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

- The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K002 - Paint Line 4	OAC rule 3745-31-05(A)(3)	<p>OC emissions shall not exceed 21.0 lbs/day, excluding cleanup</p> <p>See terms and conditions A.2.a, A.2.d and B.1.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e)(ii) and OAC rule 3745-31-05(C).</p>
	OAC rule 3745-31-05(C)	<p>OC emissions shall not exceed 2.63 tons per year (TPY), excluding cleanup, based upon a rolling, 12-month summation.</p> <p>See terms and conditions A.2.b. and B.1.</p>
	OAC rule 3745-21-07(G)(2)	<p>The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).</p>
	OAC rule 3745-21-09(U)(2)(e)(ii)	See term and condition B.2

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Emissions Unit ID: **K002**

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

- 2.a** The OC content, as applied, of each coating employed in this emissions unit shall not exceed 7.0 pounds of OC per gallon of coating.
- 2.b** The total allowable emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units K001 (Paint Line 2), K002 (Paint Line 4), K003 (Paint Line 5), K004 (Paint Line 6), K005 (Paint Line 7), K006 (Miscellaneous Metal Parts Paint Booth), K007 (Paint Line 3), K008 (Paint Line 8), P002 (Automatic Binks Paint Machine) and P005 (Facility-wide Miscellaneous Solvent Use) shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation. The permittee has existing records to demonstrate compliance with the rolling, 12-month summation limit upon issuance of the permit.
- 2.c** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the OC content limitation, the OC emissions limitations and the OC input limitations.
- 2.d** Organic compound (OC) emissions shall not exceed 8 lbs/hr when applying coatings identified as Photochemically Reactive Materials (PRM) to non-metal parts which are not oven-cured.

B. Operational Restrictions

- 1. The maximum daily OC input of coatings employed in emissions unit K002 shall not exceed 21.0 pounds per day, as applied. The maximum annual OC input of coatings employed in emissions unit K002 shall not exceed 5,250 pounds per year based upon a rolling, 12-month summation, as applied. The OC input shall be determined by multiplying the number of gallons of coating employed per month by the OC content of each coating, in pounds per gallon. The OC input rate of coatings employed is based upon the premise that 100% of the solvent contained within the coatings is emitted. Note any OC emissions from clean-up materials are permitted under air PTI 14-05438 in emissions unit P005. The permittee has existing records to demonstrate compliance with the rolling, 12-month summation limit upon issuance of the permit.
- 2. The maximum daily coating usage for this emissions unit shall not exceed 3 gallons per day when coating miscellaneous metal parts.

C. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall collect and record the following information each day for emissions unit K002:

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- a. the name and identification number of each coating;
- b. the volume, in gallons, of each coating employed on miscellaneous metal parts, and the volume, in gallons, of each coating employed on non-metal parts;
- c. the total volume, in gallons, of all of the coatings employed;
- d. the OC content of each coating applied to miscellaneous metal parts, in pounds OC per gallon of coating, as applied;
- e. the OC content of each coating applied to miscellaneous metal and non-metal parts, in pounds OC per gallon of coating, as applied;
- f. the OC emissions from the application of coatings, in pounds OC per day [the summation of b. multiplied by e. for the coating(s) employed in K002]; and
- g. a record of each coating employed in this emissions unit indicating, whether or not the coating is photochemically reactive as identified in OAC rule 3745-21-01(C)(5).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

2. The permittee shall maintain monthly records of the total OC input, in pounds, of all coatings employed in this emissions unit and the updated rolling, 12-month summation of the total OC input and emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
3. The permittee shall collect and record the following information for each hour when applying coatings identified as Photochemically Reactive Materials (PRMs) on non-metal parts in emissions unit K002:
 - a. the company identification for each coating employed;
 - b. for each day during which a photochemically reactive material is employed, the volume, in gallons, of each coating, each hour of the day;
 - c. the OC content of each coating, in pounds OC per gallon of coating, as applied; and
 - d. for each hour during which a photochemically reactive material is employed, the total OC emission rate for all coatings, in pounds per hour (b. multiplied by c. for the non-metal

PRM coating(s) employed in K002).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically" are based upon OAC rule 3745-21-01(C)(5)].

4. The permittee shall collect and record the following information each month for emission units K001 (Paint Line 2), K002 (Paint Line 4), K003 (Paint Line 5), K004 (Paint Line 6), K005 (Paint Line 7), K006 (Miscellaneous Metal Parts Paint Booth), K007 (Paint Line 3), K008 (Paint Line 8), P002 (Automatic Binks Paint Machine) and P005 (Facility-wide Miscellaneous Solvent Use):
 - a. the name and identification number of each coating, employed;
 - b. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
 - c. the total combined HAP content of each coating in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (b)];
 - d. the number of gallons of each coating employed;
 - e. the name and identification of each cleanup material employed;
 - f. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;
 - g. the total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied [sum all the individual HAP contents from (f)];
 - h. the number of gallons of each cleanup material employed;
 - i. the total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each coating plus the sum of (f) times (h) for each cleanup material];
 - j. the total combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material];
 - k. the updated rolling, 12-month summation of emissions for each individual HAP, in pounds or tons. This shall include the information for the current month and the

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preceding eleven calendar months; and

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

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

5. The permit to install for this emissions unit (K002) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

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

Pollutant: Diethylene triamine

TLV (ug/m3): 4,200

Maximum Hourly Emission Rate (lbs/hr): 0.1664

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 92

MAGLC (ug/m3): 100

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

- a. changes in the composition of the materials used, or the use of new materials, that would

Emissions Unit ID: **K002**

result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is(are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation reports which identify any exceedance of the HAP emission limitations set forth in term and condition A.2.b.

The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous three calendar months (October through December, January through March, April through June and July through September, respectively.)

If no exceedances occurred, the permittee shall state so in the report.

2. The permittee shall notify the Hamilton County Department of Environmental Services of any daily record showing that emissions unit K002 employed coatings that exceeded the applicable maximum OC content limits outlined in term and condition A.2.a. A copy of such record shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance(s) occurred.
3. The permittee shall notify the Hamilton County Department of Environmental Services of any daily record showing that emissions unit K002 employed more than the applicable maximum daily OC input limit outlined in term and condition B.1. A copy of such record shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurred.
4. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage as outlined in term and condition B.2. (i.e., the maximum daily coating usage for this emissions unit shall not exceed 3 gallons per day when coating miscellaneous metal parts). The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.
5. The permittee shall notify the Hamilton County Department of Environmental Services of any daily record showing an identification of each hour during which the organic compound emissions from the non-metal parts coatings when applying photochemically reactive materials exceeded 8 pounds per hour, and the actual organic compound emissions for each such hour.

A copy of such record shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance(s) occurred.

6. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services which specify the total OC emissions from emissions unit K002 for the previous calendar year. These reports shall be submitted by January 31 of each year.
7. The permittee shall submit quarterly deviation reports which identify any exceedance of the rolling, 12-month OC input limitation in term B.1.

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.

E. Testing Requirements

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

a. Emissions Limitation

8 lbs OC emissions/hr when applying PRM coatings on non-metal parts

Applicable Compliance Method

Compliance with the hourly OC emissions limitation shall be demonstrated by the record keeping requirement in term and condition C.3.

b. Emissions Limitation

21.0 lbs OC emissions/day

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Applicable Compliance Method

Compliance with the daily OC emissions limitation shall be demonstrated by the record keeping requirement in term and condition C.1.

c. Emissions Limitation

2.63 tons per year (TPY) OC emissions, based upon a rolling, 12-month summation

Applicable Compliance Method

Compliance with the annual OC emissions limitation shall be demonstrated by the record keeping requirement in term and condition C.2.

d. OC Content Limitation

7.0 pounds OC per gallon of coating, of each coating applied to metal parts

Applicable Compliance Method

USEPA methods 24 and 24A shall be used to determine the OC 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.

e. Material Usage Limitations

21.0 pounds per day OC input
5,250 pounds per year OC input;

Applicable Compliance Method

Compliance with the OC input limitations in terms and conditions B.1 shall be demonstrated by the record keeping in terms and conditions C.1 and C.2.

f. Emission Limitation:

9.9 TPY for any single HAP and 24.9 TPY for combined HAPs from the facility per term and condition A.2.b.

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PTI Application: 14-05502
Issued

Facility ID: 1431050909

Emissions Unit ID: **K002**

Trans**PTI A**Emissions Unit ID: **K002****Issued: To be entered upon final issuance**

Applicable Compliance Method:

Compliance with the HAP emission limitations will be determined by the record keeping requirements specified in term and condition C.4.

2. Compliance with the coating usage limitation in term and condition B.2. shall be determined by the record keeping requirements as specified in term and condition C.1.

F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A., B., C.1, C.2, C.3, C.4, D. and E.
2. This terms and conditions of this permit to install supercede the terms and conditions for emissions unit K002 in Permit To Install 14-03212 as issued December 8, 1993 and modified by PTI 14-03740 as issued March 1, 1995.

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PTI A

Emissions Unit ID: **K003**

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
K003 - Paint Line 5	OAC rule 3745-31-05(A)(3)	OAC rule 3745-21-09(U)(2)(e)(ii)
	OAC rule 3745-31-05(C)	
	OAC rule 3745-21-07(G)(1)	
	OAC rule 3745-21-07(G)(2)	

Trans**PTI A**Emissions Unit ID: **K003****Issued: To be entered upon final issuance**

Applicable Emissions
Limitations/Control Measures

OC emissions shall not exceed 21.0 lbs/day, excluding cleanup

See terms and conditions A.2.a, A.2.d and B.1.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e)(ii), OAC rule 3745-21-07(G)(1), and OAC rule 3745-31-05(C).

OC emissions shall not exceed 2.63 tons per year (TPY), excluding cleanup, based upon a rolling, 12-month summation.

See terms and conditions A.2.b. and B.1.

See term and condition A.2.e

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 B.2.

2. Additional Terms and Conditions

2.a The OC content, as applied, of each coating employed in this emissions unit shall not exceed 7.0 pounds of OC per gallon of coating.

2.b The total allowable emissions of Hazardous Air Pollutants (HAPs), as identified in Section

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112(b) of Title III of the Clean Air Act, from emissions units K001 (Paint Line 2), K002 (Paint Line 4), K003 (Paint Line 5), K004 (Paint Line 6), K005 (Paint Line 7), K006 (Miscellaneous Metal Parts Paint Booth), K007 (Paint Line 3), K008 (Paint Line 8), P002 (Automatic Binks Paint Machine) and P005 (Facility-wide Miscellaneous Solvent Use) shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation. The permittee has existing records to demonstrate compliance with the rolling, 12-month summation limit upon issuance of the permit.

- 2.c Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the OC content limitation, the OC emissions limitations and the OC input limitations.
- 2.d Organic compound (OC) emissions shall not exceed 8 lbs/hr when applying coatings identified as Photochemically Reactive Materials (PRM) to non-metal parts which are not oven-cured.
- 2.e Organic compound (OC) emissions shall not exceed 15 lbs/day, nor 3 lbs/hr when applying coatings to non-metal parts which are oven-cured.

B. Operational Restrictions

- 1. Unless otherwise restricted by term and condition A.2.e, the maximum daily OC input of coatings employed in emissions unit K003 shall not exceed 21.0 pounds per day, as applied. The maximum annual OC input of coatings employed in emissions unit K003 shall not exceed 5,250 pounds per year based upon a rolling, 12-month summation, as applied. The OC input shall be determined by multiplying the number of gallons of coating employed per month by the OC content of each coating, in pounds per gallon. The OC input rate of coatings employed is based upon the premise that 100% of the solvent contained within the coatings is emitted. Note any OC emissions from clean-up materials are permitted under air PTI 14-05438 in emissions unit P005. The permittee has existing records to demonstrate compliance with the rolling, 12-month summation limit upon issuance of the permit.
- 2. The maximum daily coating usage for this emissions unit shall not exceed 3 gallons per day when coating miscellaneous metal parts.

C. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall collect and record the following information each day for emissions unit K003:
 - a. the name and identification number of each coating;

- b. the volume, in gallons, of each coating employed on miscellaneous metal parts, and the volume, in gallons, of each coating employed on non-metal parts;
- c. the total volume, in gallons, of all of the coatings employed;
- d. the OC content of each coating applied to miscellaneous metal parts, in pounds OC per gallon of coating, as applied;
- e. the OC content of each coating applied to miscellaneous metal and non-metal parts, in pounds OC per gallon of coating, as applied;
- f. the OC emissions from the application of coatings, in pounds OC per day [the summation of b. multiplied by e. for the coating(s) employed in K003]; and
- g. a record of each coating employed in this emissions unit indicating, whether or not the coating is photochemically reactive as identified in OAC rule 3745-21-01(C)(5).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

2. The permittee shall maintain monthly records of the total OC input, in pounds, of all coatings employed in this emissions unit and the updated rolling, 12-month summation of the total OC input and emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
3. The permittee shall collect and record the following information for each hour when applying coatings identified as Photochemically Reactive Materials (PRMs) on non-metal parts in emissions unit K003:
 - a. the company identification for each coating employed;
 - b. for each day during which a photochemically reactive material is employed, the volume, in gallons, of each coating, each hour of the day;
 - c. the OC content of each coating, in pounds OC per gallon of coating, as applied; and
 - d. for each hour during which a photochemically reactive material is employed, the total OC emission rate for all coatings, in pounds per hour (b. multiplied by c. for the non-metal PRM coating(s) employed in K003).

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[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically" are based upon OAC rule 3745-21-01(C)(5)].

4. The permittee shall collect and record the following information each month for emission units K001 (Paint Line 2), K002 (Paint Line 4), K003 (Paint Line 5), K004 (Paint Line 6), K005 (Paint Line 7), K006 (Miscellaneous Metal Parts Paint Booth), K007 (Paint Line 3), K008 (Paint Line 8), P002 (Automatic Binks Paint Machine) and P005 (Facility-wide Miscellaneous Solvent Use):
 - a. the name and identification number of each coating, employed;
 - b. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
 - c. the total combined HAP content of each coating in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (b)];
 - d. the number of gallons of each coating employed;
 - e. the name and identification of each cleanup material employed;
 - f. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;
 - g. the total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied [sum all the individual HAP contents from (f)];
 - h. the number of gallons of each cleanup material employed;
 - i. the total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each coating plus the sum of (f) times (h) for each cleanup material];
 - j. the total combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material];
 - k. the updated rolling, 12-month summation of emissions for each individual HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and

Emissions Unit ID: **K003**

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

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

5. The permit to install for this emissions unit (K003) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

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

Pollutant: Diethylenetriamine

TLV (ug/m3): 4,200

Maximum Hourly Emission Rate (lbs/hr): 0.1664

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 92

MAGLC (ug/m3): 100

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

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

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modeled;

- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is(are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
6. When coating non-metal parts which are oven-cured, the permittee shall maintain daily records of the following:
- a. the OC emissions shall be determined from term C.1.f;
 - b. the hours of operation; and
 - c. the average hourly emissions rate (a/b).

D. Reporting Requirements

1. The permittee shall submit quarterly deviation reports which identify any exceedance of the HAP

emission limitations set forth in term and condition A.2.b.

The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous three calendar months (October through December, January through March, April through June and July through September, respectively.)

If no exceedances occurred, the permittee shall state so in the report.

2. The permittee shall notify the Hamilton County Department of Environmental Services of any daily record showing that emissions unit K003 employed coatings that exceeded the applicable maximum

OC content limits outlined in term and condition A.2.a. A copy of such record shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance(s) occurred.

3. The permittee shall notify the Hamilton County Department of Environmental Services of any daily record showing that emissions unit K003 employed more than the applicable maximum daily OC input limit outlined in term and condition B.1. A copy of such record shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurred.
4. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage as outlined in term and condition B.2. (i.e., the maximum daily coating usage for this emissions unit shall not exceed 3 gallons per day when coating miscellaneous metal parts). The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.
5. The permittee shall notify the Hamilton County Department of Environmental Services of any daily record showing an identification of each hour during which the organic compound emissions from the non-metal parts coatings when applying photochemically reactive materials exceeded 8 pounds per hour, and the actual organic compound emissions for each such hour.

A copy of such record shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance(s) occurred.

6. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services which specify the total OC emissions from emissions unit K003 for the previous calendar year. These reports shall be submitted by January 31 of each year.

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7. The permittee shall submit quarterly deviation reports which identify any exceedance of the rolling, 12-month OC input limitation in term B.1.

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.

8. The permittee shall submit deviation (excursion) reports which include the following information:
- a. An identification of each day during which the average hourly organic compound emissions exceeded 3 pounds per hour when applying coatings to non-metal parts which are oven-cured, and the actual average hourly organic compound emissions for each such day.
 - b. An identification of each day during which the organic compound emissions exceeded 15 pounds per day when applying coatings to non-metal parts which are oven-cured, and the actual organic compound emissions for each such day.

A copy of such record shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance(s) occurred.

E. Testing Requirements

1. Compliance with the emission limitations and other limitations in term and conditions A. and B. of these terms and conditions shall be determined in accordance with the following methods:
- a. Emissions Limitation

8 lbs OC emissions/hr when applying PRM coatings on non-metal parts

Applicable Compliance Method

Compliance with the hourly OC emissions limitation shall be demonstrated by the record keeping requirement in term and condition C.3.
 - b. Emissions Limitation

21.0 lbs OC emissions/day

Applicable Compliance Method

Compliance with the daily OC emissions limitation shall be demonstrated by the record keeping requirement in term and condition C.1.

c. Emissions Limitation

2.63 tons per year (TPY) OC emissions, based upon a rolling, 12-month summation

Applicable Compliance Method

Compliance with the annual OC emissions limitation shall be demonstrated by the record keeping requirement in term and condition C.2.

d. OC Content Limitation

7.0 pounds OC per gallon of coating, of each coating applied to metal parts

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Applicable Compliance Method

USEPA methods 24 and 24A shall be used to determine the OC 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.

e. Material Usage Limitations

21.0 pounds per day OC input
5,250 pounds per year OC input;

Applicable Compliance Method

Compliance with the OC input limitations in terms and conditions B.1 shall be demonstrated by the record keeping in terms and conditions C.1 and C.2.

f. Emission Limitation:

9.9 TPY for any single HAP and 24.9 TPY for combined HAPs from the facility per term and condition A.2.b.

Applicable Compliance Method:

Compliance with the HAP emission limitations will be determined by the record keeping requirements specified in term and condition C.4.

g. Emissions Limitation

3 lbs OC emissions/hr when applying coatings on non-metal parts and oven drying the parts.

15 lbs OC emissions/day when applying coatings on non-metal parts and oven drying the parts.

Applicable Compliance Method

Compliance with the hourly OC emissions limitation shall be demonstrated by the record keeping requirement in term and condition C.6.

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2. Compliance with the coating usage limitation in term and condition B.2. shall be determined by the record keeping requirements as specified in term and condition C.1.

Trans

PTI A

Emissions Unit ID: **K003**

Issued: To be entered upon final issuance

F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A., B., C.1, C.2, C.3, C.4, C.6, D. and E.
2. This terms and conditions of this permit to install supercede the terms and conditions for emissions unit K003 in Permit To Install 14-03212 as issued December 8, 1993.

Issued: **To be entered upon final issuance**

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
K004 - Paint Line 6	OAC rule 3745-31-05(A)(3)	OAC rule 3745-21-09(U)(2)(e)(ii)
	OAC rule 3745-31-05(C)	
	OAC rule 3745-21-07(G)(1)	
	OAC rule 3745-21-07(G)(2)	

Applicable Emissions
Limitations/Control Measures

OC emissions shall not exceed 21.0 lbs/day, excluding cleanup

See terms and conditions A.2.a, A.2.d and B.1.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e)(ii), OAC rule 3745-21-07(G)(1), and OAC rule 3745-31-05(C).

OC emissions shall not exceed 2.63 tons per year (TPY), excluding cleanup, based upon a rolling, 12-month summation.

See terms and conditions A.2.b. and B.1.

See term and condition A.2.e

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 B.2.

2. Additional Terms and Conditions

2.a The OC content, as applied, of each coating employed in this emissions unit shall not exceed 7.0 pounds of OC per gallon of coating.

2.b The total allowable emissions of Hazardous Air Pollutants (HAPs), as identified in Section

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112(b) of Title III of the Clean Air Act, from emission units K001 (Paint Line 2), K002 (Paint Line 4), K003 (Paint Line 5), K004 (Paint Line 6), K005 (Paint Line 7), K006 (Miscellaneous Metal Parts Paint Booth), K007 (Paint Line 3), K008 (Paint Line 8), P002 (Automatic Binks Paint Machine) and P005 (Facility-wide Miscellaneous Solvent Use) shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation. The permittee has existing records to demonstrate compliance with the rolling, 12-month summation limit upon issuance of the permit.

- 2.c** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the OC content limitation, the OC emissions limitations and the OC input limitations.
- 2.d** Organic compound (OC) emissions shall not exceed 8 lbs/hr when applying coatings identified as Photochemically Reactive Materials (PRM) to non-metal parts which are not oven-cured.
- 2.e** Organic compound (OC) emissions shall not exceed 15 lbs/day, nor 3 lbs/hr when applying coatings to non-metal parts which are oven-cured.

B. Operational Restrictions

1. Unless otherwise restricted by term and condition A.2.e, the maximum daily OC input of coatings employed in emissions unit K004 shall not exceed 21.0 pounds per day, as applied. The maximum annual OC input of coatings employed in emissions unit K004 shall not exceed 5,250 pounds per year based upon a rolling, 12-month summation, as applied. The OC input shall be determined by multiplying the number of gallons of coating employed per month by the OC content of each coating, in pounds per gallon. The OC input rate of coatings employed is based upon the premise that 100% of the solvent contained within the coatings is emitted. Note any OC emissions from clean-up materials are permitted under air PTI 14-05438 in emissions unit P005. The permittee has existing records to demonstrate compliance with the rolling, 12-month summation limit upon issuance of the permit.
2. The maximum daily coating usage for this emissions unit shall not exceed 3 gallons per day when coating miscellaneous metal parts.

Issued: To be entered upon final issuance**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information each day for emissions unit K004:
 - a. the name and identification number of each coating;
 - b. the volume, in gallons, of each coating employed on miscellaneous metal parts, and the volume, in gallons, of each coating employed on non-metal parts;
 - c. the total volume, in gallons, of all of the coatings employed;
 - d. the OC content of each coating applied to miscellaneous metal parts, in pounds OC per gallon of coating, as applied;
 - e. the OC content of each coating applied to miscellaneous metal and non-metal parts, in pounds OC per gallon of coating, as applied;
 - f. the OC emissions from the application of coatings, in pounds OC per day [the summation of b. multiplied by e. for the coating(s) employed in K003]; and
 - g. a record of each coating employed in this emissions unit indicating, whether or not the coating is photochemically reactive as identified in OAC rule 3745-21-01(C)(5).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

2. The permittee shall maintain monthly records of the total OC input, in pounds, of all coatings employed in this emissions unit and the updated rolling, 12-month summation of the total OC input and emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
3. The permittee shall collect and record the following information for each hour when applying coatings identified as Photochemically Reactive Materials (PRMs) on non-metal parts in emissions unit K004:
 - a. the company identification for each coating employed;
 - b. for each day during which a photochemically reactive material is employed, the volume, in gallons, of each coating, each hour of the day;

- c. the OC content of each coating, in pounds OC per gallon of coating, as applied; and
- d. for each hour during which a photochemically reactive material is employed, the total OC emission rate for all coatings, in pounds per hour (b. multiplied by c. for the non-metal PRM coating(s) employed in K004).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically" are based upon OAC rule 3745-21-01(C)(5)].

4. The permittee shall collect and record the following information each month for emission units K001 (Paint Line 2), K002 (Paint Line 4), K003 (Paint Line 5), K004 (Paint Line 6), K005 (Paint Line 7), K006 (Miscellaneous Metal Parts Paint Booth), K007 (Paint Line 3), K008 (Paint Line 8), P002 (Automatic Binks Paint Machine) and P005 (Facility-wide Miscellaneous Solvent Use):
 - a. the name and identification number of each coating, employed;
 - b. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
 - c. the total combined HAP content of each coating in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (b)];
 - d. the number of gallons of each coating employed;
 - e. the name and identification of each cleanup material employed;
 - f. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;
 - g. the total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied [sum all the individual HAP contents from (f)];
 - h. the number of gallons of each cleanup material employed;
 - i. the total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each coating plus the sum of (f) times (h) for each cleanup material];
 - j. the total combined HAP emissions from all coatings and cleanup materials employed, in

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pounds or tons per month [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material];

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

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

- 5. The permit to install for this emissions unit (K004) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

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

Pollutant: Diethylenetriamine

TLV (ug/m3): 4,200

Maximum Hourly Emission Rate (lbs/hr): 0.1664

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 92

MAGLC (ug/m3): 100

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

Emissions Unit ID: **K004**

satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used, or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is(are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
6. When coating non-metal parts which are oven-cured, the permittee shall maintain daily records of the following:
- a. the OC emissions shall be determined from term C.1.f;

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- b. the hours of operation; and
- c. the average hourly emissions rate (a/b).

D. Reporting Requirements

1. The permittee shall submit quarterly deviation reports which identify any exceedance of the HAP emission limitations set forth in term and condition A.2.b.

The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous three calendar months (October through December, January through March, April through June and July through September, respectively.)

If no exceedances occurred, the permittee shall state so in the report.

2. The permittee shall notify the Hamilton County Department of Environmental Services of any daily record showing that emissions unit K004 employed coatings that exceeded the applicable maximum OC content limits outlined in term and condition A.2.a. A copy of such record shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance(s) occurred.
3. The permittee shall notify the Hamilton County Department of Environmental Services of any daily record showing that emissions unit K004 employed more than the applicable maximum daily OC input limit outlined in term and condition B.1. A copy of such record shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurred.
4. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage as outlined in term and condition B.2. (i.e., the maximum daily coating usage for this emissions unit shall not exceed 3 gallons per day when coating miscellaneous metal parts). The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.
5. The permittee shall notify the Hamilton County Department of Environmental Services of any daily record showing an identification of each hour during which the organic compound emissions from the non-metal parts coatings when applying photochemically reactive materials exceeded 8 pounds per hour, and the actual organic compound emissions for each such hour.

A copy of such record shall be sent to the Hamilton County Department of Environmental

Services within 45 days after the exceedance(s) occurred.

6. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services which specify the total OC emissions from emissions unit K004 for the previous calendar year. These reports shall be submitted by January 31 of each year.
7. The permittee shall submit quarterly deviation reports which identify any exceedance of the rolling, 12-month OC input limitation in term B.1.

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.

8. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the average hourly organic compound emissions exceeded 3 pounds per hour when applying coatings to non-metal parts which are oven-cured, and the actual average hourly organic compound emissions for each such day.
 - b. An identification of each day during which the organic compound emissions exceeded 15 pounds per day when applying coatings to non-metal parts which are oven-cured, and the actual organic compound emissions for each such day.

A copy of such record shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance(s) occurred.

E. Testing Requirements

1. Compliance with the emission limitations and other limitations in term and conditions A. and B. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emissions Limitation

8 lbs OC emissions/hr when applying PRM coatings on non-metal parts

Applicable Compliance Method

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Compliance with the hourly OC emissions limitation shall be demonstrated by the record keeping requirement in term and condition C.3.

b. Emissions Limitation

21.0 lbs OC emissions/day

Applicable Compliance Method

Compliance with the daily OC emissions limitation shall be demonstrated by the record keeping requirement in term and condition C.1.

c. Emissions Limitation

2.63 tons per year (TPY) OC emissions, based upon a rolling, 12-month summation

Applicable Compliance Method

Compliance with the annual OC emissions limitation shall be demonstrated by the record keeping requirement in term and condition C.2.

d. OC Content Limitation

7.0 pounds OC per gallon of coating, of each coating applied to metal parts

Applicable Compliance Method

USEPA methods 24 and 24A shall be used to determine the OC content for coatings. 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, 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.

e. Material Usage Limitations

21.0 pounds per day OC input
 5,250 pounds per year OC input;

Applicable Compliance Method

Compliance with the OC input limitations in terms and conditions B.1 shall be demonstrated by the record keeping in terms and conditions C.1 and C.2.

f. Emission Limitation:

9.9 TPY for any single HAP and 24.9 TPY for combined HAPs from the facility per term and condition A.2.b.

Applicable Compliance Method:

Compliance with the HAP emission limitations will be determined by the record keeping requirements specified in term and condition C.4.

g. Emissions Limitation

3 lbs OC emissions/hr when applying coatings on non-metal parts and oven drying the parts
 15 lbs OC emissions/day when applying coatings on non-metal parts and oven drying the parts

Applicable Compliance Method

Compliance with the hourly OC emissions limitation shall be demonstrated by the record keeping requirement in term and condition C.6.

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2. Compliance with the coating usage limitation in term and condition B.2. shall be determined by the record keeping requirements as specified in term and condition C.1.

Trans

PTI A

Emissions Unit ID: **K004**

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F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A., B., C.1, C.2, C.3, C.4, C.6, D. and E.
2. This terms and conditions of this permit to install supercede the terms and conditions for emissions unit K004 in Permit To Install 14-03212 as issued December 8, 1993 and modified by PTI 14-03740 as issued March 1, 1995.

**Trans
PTI A**

Emissions Unit ID: **K005**

Issued: To be entered upon final issuance

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment	<u>Applicable Rules/Requirements</u>	OAC rule 3745-21-09(U)(1)
K005 - Paint Line 7	OAC rule 3745-31-05(A)(3)	
	OAC rule 3745-31-05(C)	
	OAC rule 3745-21-07(G)(1)	
	OAC rule 3745-21-07(G)(2)	

Trans**PTI A**Emissions Unit ID: **K005****Issued: To be entered upon final issuance**

Applicable Emissions
Limitations/Control Measures

OC emissions shall not exceed 434.5 lbs/day, excluding cleanup

See terms A.2.d and B.1.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(1), OAC rule 3745-21-09(U)(1) and OAC rule 3745-31-05(C).

OC emissions shall not exceed 31.5 tons per year (TPY), excluding cleanup, based upon a rolling, 12-month summation.

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

See term and condition A.2.e

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.2.a

2. Additional Terms and Conditions

- 2.a** The VOC content, as applied, of each extreme performance coating employed in this emissions unit shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied. The VOC content, as applied, of each miscellaneous metal coating employed in this emissions unit shall not exceed 3.0 pounds of VOC per

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gallon of coating, excluding water and exempt solvents, as applied.

- 2.b** The total allowable emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units K001 (Paint Line 2), K002 (Paint Line 4), K003 (Paint Line 5), K004 (Paint Line 6), K005 (Paint Line 7), K006 (Miscellaneous Metal Parts Paint Booth), K007 (Paint Line 3), K008 (Paint Line 8), P002 (Automatic Binks Paint Machine) and P005 (Facility-wide Miscellaneous Solvent Use) shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation. The permittee has existing records to demonstrate compliance with the rolling, 12-month summation limit upon issuance of the permit.
- 2.c** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the VOC content limitation, the OC emissions limitations and the OC input limitations.
- 2.d** Organic compound (OC) emissions shall not exceed 8 lbs/hr and 40 lbs/day when applying coatings identified as Photochemically Reactive Materials (PRM) to non-metal parts which are not oven-cured.
- 2.e** Organic compound (OC) emissions shall not exceed 15 lbs/day, nor 3 lbs/hr when applying coatings to non-metal parts which are oven-cured.

B. Operational Restrictions

- 1. Unless otherwise restricted, the maximum daily OC input of coatings employed in emissions unit K005 shall not exceed 434.5 pounds per day, as applied. The maximum annual OC input of coatings employed in emissions unit K005 shall not exceed 63,000 pounds per year based upon a rolling, 12-month summation, as applied. The OC input shall be determined by multiplying the number of gallons of coating employed per month by the OC content of each coating, in pounds per gallon. The OC input rate of coatings employed is based upon the premise that 100% of the solvent contained within the coatings is emitted. Note any OC emissions from clean-up materials are permitted under air PTI 14-05438 in emissions unit P005. The permittee has existing records to demonstrate compliance with the rolling, 12-month summation limit upon issuance of the permit.

C. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall collect and record the following information each day for emissions unit K005:
 - a. the name and identification number of each coating;

- b. the volume, in gallons, of each extreme performance coating employed on miscellaneous metal parts; the volume, in gallons, of each coating employed on miscellaneous metal parts, and the volume, in gallons, of each coating employed on non-metal parts;
- c. the total volume, in gallons, of all of the coatings employed, as applied;
- d. the VOC content of each extreme performance coating applied to miscellaneous metal parts, in pounds VOC per gallon of coating, as applied, excluding water and exempt solvents; and the VOC content of each coating applied to miscellaneous metal parts, in pounds VOC per gallon of coating, as applied, excluding water and exempt solvents;
- e. the OC content of each coating applied to non-metal parts, in pounds OC per gallon of coating, as applied;
- f. the OC emissions from the application of coatings, in pounds OC per day [the summation of b. multiplied by d. for miscellaneous metal parts coating(s) plus b. multiplied by e. for non-metal parts coating(s) employed in K005]; and
- g. a record of each coating employed in this emissions unit indicating, whether or not the coating is photochemically reactive as identified in OAC rule 3745-21-01(C)(5).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

2. The permittee shall maintain monthly records of the total OC input, in pounds, of all coatings employed in this emissions unit and the updated rolling, 12-month summation of the total OC input and emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
3. The permittee shall collect and record the following information for each hour when applying coatings identified as Photochemically Reactive Materials (PRMs) on non-metal parts in emissions unit K005:
 - a. the company identification for each coating employed;
 - b. for each day during which a photochemically reactive material is employed, the volume, in gallons, of each coating, each hour of the day;
 - c. the OC content of each coating, in pounds OC per gallon of coating, as applied; and

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- d. for each hour during which a photochemically reactive material is employed, the total OC emission rate for all coatings, in pounds per hour (b. multiplied by c. for the non-metal PRM coating(s) employed in K005).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically" are based upon OAC rule 3745-21-01(C)(5)].

4. The permittee shall collect and record the following information each month for emission units K001 (Paint Line 2), K002 (Paint Line 4), K003 (Paint Line 5), K004 (Paint Line 6), K005 (Paint Line 7), K006 (Miscellaneous Metal Parts Paint Booth), K007 (Paint Line 3), K008 (Paint Line 8), P002 (Automatic Binks Paint Machine) and P005 (Facility-wide Miscellaneous Solvent Use):
 - a. the name and identification number of each coating, employed;
 - b. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
 - c. the total combined HAP content of each coating in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (b)];
 - d. the number of gallons of each coating employed;
 - e. the name and identification of each cleanup material employed;
 - f. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;
 - g. the total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied [sum all the individual HAP contents from (f)];
 - h. the number of gallons of each cleanup material employed;
 - i. the total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each coating plus the sum of (f) times (h) for each cleanup material];
 - j. the total combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material];

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

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

5. The permit to install for this emissions unit (K005) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

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

Pollutant: Diethylenetriamine

TLV (ug/m3): 4,200

Maximum Hourly Emission Rate (lbs/hr): 0.8832

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 80

MAGLC (ug/m3): 100

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

Emissions Unit ID: **K005**

- a. changes in the composition of the materials used, or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is(are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
6. When coating non-metal parts which are oven-cured, the permittee shall maintain daily records of the following:
- a. the OC emissions shall be determined from term C.1.f;
 - b. the hours of operation; and
 - c. the average hourly emissions rate (a/b).

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D. Reporting Requirements

1. The permittee shall submit quarterly deviation reports which identify any exceedance of the HAP emission limitations set forth in term and condition A.2.b.

The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous three calendar months (October through December, January through March, April through June and July through September, respectively.)

If no exceedances occurred, the permittee shall state so in the report.

2. The permittee shall notify the Hamilton County Department of Environmental Services of any daily record showing that emissions unit K005 employed coatings that exceeded the applicable maximum VOC content limits outlined in term and condition A.2.a. A copy of such record shall be sent to the Hamilton County Department of Environmental Services within 30 days after the exceedance(s) occurred.
3. The permittee shall notify the Hamilton County Department of Environmental Services of any daily record showing that emissions unit K005 employed more than the applicable maximum daily OC input limit outlined in term and condition B.1. A copy of such record shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurred.
4. The permittee shall notify the Hamilton County Department of Environmental Services of any daily record showing an identification of each hour during which the organic compound emissions from the non-metal parts coatings when applying photochemically reactive materials exceeded 8 pounds per hour and/or 40 pounds per day, and the actual organic compound emissions for each such hour or day.

A copy of such record shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance(s) occurred.

5. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services which specify the total OC emissions from emissions unit K005 for the previous calendar year. These reports shall be submitted by January 31 of each year.
6. The permittee shall submit quarterly deviation reports which identify any exceedance of the rolling, 12-month OC input limitation in term B.1.

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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.

7. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the average hourly organic compound emissions exceeded 3 pounds per hour when applying coatings to non-metal parts which are oven-cured, and the actual average hourly organic compound emissions for each such day.
 - b. An identification of each day during which the organic compound emissions exceeded 15 pounds per day when applying coatings to non-metal parts which are oven-cured, and the actual organic compound emissions for each such day.

A copy of such record shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance(s) occurred.

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E. Testing Requirements

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

a. Emissions Limitation

8 lbs OC emissions/hr and 40 lbs/day when applying PRM coatings on non-metal parts

Applicable Compliance Method

Compliance with the hourly OC emissions limitation shall be demonstrated by the record keeping requirement in terms and conditions C.1 and C.3.

b. Emissions Limitation

434.5 lbs OC emissions/day

Applicable Compliance Method

Compliance with the daily OC emissions limitation shall be demonstrated by the record keeping requirement in term and condition C.1.

c. Emissions Limitation

3 lbs OC emissions/hr when applying coatings on non-metal parts and oven drying the parts

15 lbs OC emissions/day when applying coatings on non-metal parts and oven drying the parts

Applicable Compliance Method

Compliance with the hourly OC emissions limitation shall be demonstrated by the record keeping requirement in term and condition C.6.

d. Emissions Limitation

31.5 tons per year (TPY) OC emissions, based upon a rolling, 12-month summation

Applicable Compliance Method

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Compliance with the annual OC emissions limitation shall be demonstrated by the record keeping in term and condition C.2.

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e. VOC Content Limitation

3.5 pounds VOC per gallon of extreme performance coating, excluding water and exempt solvents of each coating applied to metal parts;

3.0 pounds VOC per gallon of miscellaneous metal coating, excluding water and exempt solvents of each coating applied to metal parts

Applicable Compliance Method

USEPA methods 24 and 24A shall be used to determine the VOC content for coatings. 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, 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.

f. Material Usage Limitations

434.5 pounds per day OC input

63,000 pounds per year OC input;

Applicable Compliance Method

Compliance with the OC input limitations in terms and conditions B.1 shall be demonstrated by the record keeping in terms and conditions C.1 and C.2.

g. Emission Limitation:

9.9 TPY for any single HAP and 24.9 TPY for combined HAPs from the facility per term and condition A.2.b.

Applicable Compliance Method:

Compliance with the HAP emission limitations will be determined by the record keeping requirements specified in term and condition C.4.

F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A., B., C.1, C.2, C.3, C.4, C.6, D. and E.

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2. This terms and conditions of this permit to install supercede the terms and conditions for emissions unit K005 in Permit To Install 14-03523 as issued September 14, 1994.

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K007 - Paint Line 3	OAC rule 3745-31-05(A)(3)	OC emissions shall not exceed 21.0 lbs/day, excluding cleanup See terms and conditions A.2.a, A.2.d and B.1. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e)(ii) and OAC rule 3745-31-05(C).
	OAC rule 3745-31-05(C)	OC emissions shall not exceed 2.63 tons per year (TPY), excluding cleanup, based upon a rolling, 12-month summation. See terms and conditions A.2.b. and B.1.
	OAC rule 3745-21-07(G)(2)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-09(U)(2)(e)(ii)	See term and condition B.2.

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Emissions Unit ID: **K007**

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

- 2.a** The OC content, as applied, of each coating employed in this emissions unit shall not exceed 7.0 pounds of OC per gallon of coating.
- 2.b** The total allowable emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emission units K001 (Paint Line 2), K002 (Paint Line 4), K003 (Paint Line 5), K004 (Paint Line 6), K005 (Paint Line 7), K006 (Miscellaneous Metal Parts Paint Booth), K007 (Paint Line 3), K008 (Paint Line 8), P002 (Automatic Binks Paint Machine) and P005 (Facility-wide Miscellaneous Solvent Use) shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation. The permittee has existing records to demonstrate compliance with the rolling, 12-month summation limit upon issuance of the permit.
- 2.c** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the OC content limitation, the OC emissions limitations and the OC input limitations.
- 2.d** Organic compound (OC) emissions shall not exceed 8 lbs/hr when applying coatings identified as Photochemically Reactive Materials (PRM) to non-metal parts which are not oven-cured.

B. Operational Restrictions

- 1. The maximum daily OC input of coatings employed in emissions unit K007 shall not exceed 21.0 pounds per day, as applied. The maximum annual OC input of coatings employed in emissions unit K007 shall not exceed 5,250 pounds per year based upon a rolling, 12-month summation, as applied. The OC input shall be determined by multiplying the number of gallons of coating employed per month by the OC content of each coating, in pounds per gallon. The OC input rate of coatings employed is based upon the premise that 100% of the solvent contained within the coatings is emitted. Note any OC emissions from clean-up materials are permitted under air PTI 14-05438 in emissions unit P005. The permittee has existing records to demonstrate compliance with the rolling, 12-month summation limit upon issuance of the permit.
- 2. The maximum daily coating usage for this emissions unit shall not exceed 3 gallons per day when coating miscellaneous metal parts.

C. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall collect and record the following information each day for emissions unit K007:

- a. the name and identification number of each coating;
- b. the volume, in gallons, of each coating employed on miscellaneous metal parts, and the volume, in gallons, of each coating employed on non-metal parts;
- c. the total volume, in gallons, of all of the coatings employed;
- d. the OC content of each coating applied to miscellaneous metal parts, in pounds OC per gallon of coating, as applied;
- e. the OC content of each coating applied to miscellaneous metal and non-metal parts, in pounds OC per gallon of coating, as applied;
- f. the OC emissions from the application of coatings, in pounds OC per day [the summation of b. multiplied by e. for the coating(s) employed in K007]; and
- g. a record of each coating employed in this emissions unit indicating, whether or not the coating is photochemically reactive as identified in OAC rule 3745-21-01(C)(5).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

2. The permittee shall maintain monthly records of the total OC input, in pounds, of all coatings employed in this emissions unit and the updated rolling, 12-month summation of the total OC input and emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
3. The permittee shall collect and record the following information for each hour when applying coatings identified as Photochemically Reactive Materials (PRMs) on non-metal parts in emissions unit K007:
 - a. the company identification for each coating employed;
 - b. for each day during which a photochemically reactive material is employed, the volume, in gallons, of each coating, each hour of the day;
 - c. the OC content of each coating, in pounds OC per gallon of coating, as applied; and
 - d. for each hour during which a photochemically reactive material is employed, the total OC emission rate for all coatings, in pounds per hour (b. multiplied by c. for the non-metal

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PRM coating(s) employed in K007).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically" are based upon OAC rule 3745-21-01(C)(5)].

4. The permittee shall collect and record the following information each month for emission units K001 (Paint Line 2), K002 (Paint Line 4), K003 (Paint Line 5), K004 (Paint Line 6), K005 (Paint Line 7), K006 (Miscellaneous Metal Parts Paint Booth), K007 (Paint Line 3), K008 (Paint Line 8), P002 (Automatic Binks Paint Machine) and P005 (Facility-wide Miscellaneous Solvent Use):
 - a. the name and identification number of each coating, employed;
 - b. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
 - c. the total combined HAP content of each coating in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (b)];
 - d. the number of gallons of each coating employed;
 - e. the name and identification of each cleanup material employed;
 - f. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;
 - g. the total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied [sum all the individual HAP contents from (f)];
 - h. the number of gallons of each cleanup material employed;
 - i. the total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each coating plus the sum of (f) times (h) for each cleanup material];
 - j. the total combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material];
 - k. the updated rolling, 12-month summation of emissions for each individual HAP, in pounds or tons. This shall include the information for the current month and the

preceding eleven calendar months; and

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

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

D. Reporting Requirements

1. The permittee shall submit quarterly deviation reports which identify any exceedance of the HAP emission limitations set forth in term and condition A.2.b.

The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous three calendar months (October through December, January through March, April through June and July through September, respectively.)

If no exceedances occurred, the permittee shall state so in the report.

2. The permittee shall notify the Hamilton County Department of Environmental Services of any daily record showing that emissions unit K007 employed coatings that exceeded the applicable maximum OC content limits outlined in term and condition A.2.a. A copy of such record shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance(s) occurred.
3. The permittee shall notify the Hamilton County Department of Environmental Services of any daily record showing that emissions unit K007 employed more than the applicable maximum daily OC input limit outlined in term and condition B.1. A copy of such record shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurred.
4. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage as outlined in term and condition B.2. (i.e., the maximum daily coating usage for this emissions unit shall not exceed 3 gallons per day when coating miscellaneous metal parts). The notification shall include a copy of such record and shall be sent to the Hamilton County

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Department of Environmental Services within 45 days after the exceedance occurs.

5. The permittee shall notify the Hamilton County Department of Environmental Services of any daily record showing an identification of each hour during which the organic compound emissions from the non-metal parts coatings when applying photochemically reactive materials exceeded 8 pounds per hour, and the actual organic compound emissions for each such hour.

A copy of such record shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance(s) occurred.

6. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services which specify the total OC emissions from emissions unit K007 for the previous calendar year. These reports shall be submitted by January 31 of each year.
7. The permittee shall submit quarterly deviation reports which identify any exceedance of the rolling, 12-month OC input limitation in term B.1.

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.

E. Testing Requirements

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

- a. Emissions Limitation

8 lbs OC emissions/hr when applying PRM coatings on non-metal parts

Applicable Compliance Method

Compliance with the hourly OC emissions limitation shall be demonstrated by the record keeping requirement in term and condition C.3.

- b. Emissions Limitation

21.0 lbs OC emissions/day

Applicable Compliance Method

Compliance with the daily OC emissions limitation shall be demonstrated by the record keeping requirement in term and condition C.1.

c. Emissions Limitation

2.63 tons per year (TPY) OC emissions, based upon a rolling, 12-month summation

Applicable Compliance Method

Compliance with the annual OC emissions limitation shall be demonstrated by the record keeping requirement in term and condition C.2.

d. OC Content Limitation

7.0 pounds OC per gallon of coating, of each coating applied to metal parts

Applicable Compliance Method

USEPA methods 24 and 24A shall be used to determine the OC 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.

e. Material Usage Limitations

21.0 pounds per day OC input
5,250 pounds per year OC input;

Applicable Compliance Method

Compliance with the OC input limitations in terms and conditions B.1 shall be demonstrated by the record keeping in terms and conditions C.1 and C.2.

f. Emission Limitation:

9.9 TPY for any single HAP and 24.9 TPY for combined HAPs from the facility per term

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and condition A.2.b.

Applicable Compliance Method:

Compliance with the HAP emission limitations will be determined by the record keeping requirements specified in term and condition C.4.

2. Compliance with the coating usage limitation in term and condition B.2. shall be determined by the record keeping requirements as specified in term and condition C.1.

F. Miscellaneous Requirements

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

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment	<u>Applicable Rules/Requirements</u>	OAC rule 3745-21-09(U)(1)
K008 - Paint Line 8	OAC rule 3745-31-05(A)(3)	
	OAC rule 3745-31-05(C)	
	OAC rule 3745-21-07(G)(1)	
	OAC rule 3745-21-07(G)(2)	

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Applicable Emissions
Limitations/Control Measures

OC emissions shall not exceed
 434.5 lbs/day, excluding cleanup

See terms A.2.d and B.1.

The requirements of this rule also
 include compliance with the
 requirements of OAC rule
 3745-21-07(G)(1), OAC rule
 3745-21-09(U)(1) and OAC rule
 3745-31-05(C).

OC emissions shall not exceed 31.5
 tons per year (TPY), excluding
 cleanup, based upon a rolling,
 12-month summation.

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

See term and condition A.2.e

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.2.a

2. Additional Terms and Conditions

- 2.a** The VOC content, as applied, of each extreme performance coating employed in this emissions unit shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied. The VOC content, as applied, of each miscellaneous metal coating employed in this emissions unit shall not exceed 3.0 pounds of VOC per

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gallon of coating, excluding water and exempt solvents, as applied.

- 2.b** The total allowable emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units K001 (Paint Line 2), K002 (Paint Line 4), K003 (Paint Line 5), K004 (Paint Line 6), K005 (Paint Line 7), K006 (Miscellaneous Metal Parts Paint Booth), K007 (Paint Line 3), K008 (Paint Line 8), P002 (Automatic Binks Paint Machine) and P005 (Facility-wide Miscellaneous Solvent Use) shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation. The permittee has existing records to demonstrate compliance with the rolling, 12-month summation limit upon issuance of the permit.
- 2.c** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the VOC content limitation, the OC emissions limitations and the OC input limitations.
- 2.d** Organic compound (OC) emissions shall not exceed 8 lbs/hr and 40 lbs/day when applying coatings identified as Photochemically Reactive Materials (PRM) to non-metal parts which are not oven-cured.
- 2.e** Organic compound (OC) emissions shall not exceed 15 lbs/day, nor 3 lbs/hr when applying coatings to non-metal parts which are oven-cured.

B. Operational Restrictions

- 1. Unless otherwise restricted, the maximum daily OC input of coatings employed in emissions unit K008 shall not exceed 434.5 pounds per day, as applied. The maximum annual OC input of coatings employed in emissions unit K008 shall not exceed 63,000 pounds per year based upon a rolling, 12-month summation, as applied. The OC input shall be determined by multiplying the number of gallons of coating employed per month by the OC content of each coating, in pounds per gallon. The OC input rate of coatings employed is based upon the premise that 100% of the solvent contained within the coatings is emitted. Note any OC emissions from clean-up materials are permitted under air PTI 14-05438 in emissions unit P005. The permittee has existing records to demonstrate compliance with the rolling, 12-month summation limit upon issuance of the permit.

C. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall collect and record the following information each day for emissions unit K008:
 - a. the name and identification number of each coating;

- b. the volume, in gallons, of each extreme performance coating employed on miscellaneous metal parts; the volume, in gallons, of each coating employed on miscellaneous metal parts, and the volume, in gallons, of each coating employed on non-metal parts;
- c. the total volume, in gallons, of all of the coatings employed, as applied;
- d. the VOC content of each extreme performance coating applied to miscellaneous metal parts, in pounds VOC per gallon of coating, as applied, excluding water and exempt solvents; and the VOC content of each coating applied to miscellaneous metal parts, in pounds VOC per gallon of coating, as applied, excluding water and exempt solvents;
- e. the OC content of each coating applied to non-metal parts, in pounds OC per gallon of coating, as applied;
- f. the OC emissions from the application of coatings, in pounds OC per day [the summation of b. multiplied by d. for miscellaneous metal parts coating(s) plus b. multiplied by e. for non-metal parts coating(s) employed in K008].
- g. a record of each coating employed in this emissions unit indicating, whether or not the coating is photochemically reactive as identified in OAC rule 3745-21-01(C)(5).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

2. The permittee shall maintain monthly records of the total OC input, in pounds, of all coatings employed in this emissions unit and the updated rolling, 12-month summation of the total OC input and emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
3. The permittee shall collect and record the following information for each hour when applying coatings identified as Photochemically Reactive Materials (PRMs) on non-metal parts in emissions unit K008:
 - a. the company identification for each coating employed;
 - b. for each day during which a photochemically reactive material is employed, the volume, in gallons, of each coating, each hour of the day;
 - c. the OC content of each coating, in pounds OC per gallon of coating, as applied; and

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- d. for each hour during which a photochemically reactive material is employed, the total OC emission rate for all coatings, in pounds per hour (b. multiplied by c. for the non-metal PRM coating(s) employed in K008).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically" are based upon OAC rule 3745-21-01(C)(5)].

4. The permittee shall collect and record the following information each month for emission units K001 (Paint Line 2), K002 (Paint Line 4), K003 (Paint Line 5), K004 (Paint Line 6), K005 (Paint Line 7), K006 (Miscellaneous Metal Parts Paint Booth), K007 (Paint Line 3), K008 (Paint Line 8), P002 (Automatic Binks Paint Machine) and P005 (Facility-wide Miscellaneous Solvent Use):
 - a. the name and identification number of each coating, employed;
 - b. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
 - c. the total combined HAP content of each coating in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (b)];
 - d. the number of gallons of each coating employed;
 - e. the name and identification of each cleanup material employed;
 - f. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;
 - g. the total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied [sum all the individual HAP contents from (f)];
 - h. the number of gallons of each cleanup material employed;
 - i. the total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each coating plus the sum of (f) times (h) for each cleanup material];
 - j. the total combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material];

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

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

5. The permit to install for this emissions unit (K008) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

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

Pollutant: Diethylenetriamine

TLV (ug/m3): 4,200

Maximum Hourly Emission Rate (lbs/hr): 0.8832

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 80

MAGLC (ug/m3): 100

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

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- a. changes in the composition of the materials used, or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is(are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
6. When coating non-metal parts which are oven-cured, the permittee shall maintain daily records of the following:
- a. the OC emissions shall be determined from term C.1.f;
 - b. the hours of operation; and
 - c. the average hourly emissions rate (a/b).

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1. The permittee shall submit quarterly deviation reports which identify any exceedance of the HAP emission limitations set forth in term and condition A.2.b.

The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous three calendar months (October through December, January through March, April through June and July through September, respectively.)

If no exceedances occurred, the permittee shall state so in the report.

2. The permittee shall notify the Hamilton County Department of Environmental Services of any daily record showing that emissions unit K008 employed coatings that exceeded the applicable maximum VOC content limits outlined in term and condition A.2.a. A copy of such record shall be sent to the Hamilton County Department of Environmental Services within 30 days after the exceedance(s) occurred.
3. The permittee shall notify the Hamilton County Department of Environmental Services of any daily record showing that emissions unit K008 employed more than the applicable maximum daily OC input limit outlined in term and condition B.1. A copy of such record shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurred.
4. The permittee shall notify the Hamilton County Department of Environmental Services of any daily record showing an identification of each hour during which the organic compound emissions from the non-metal parts coatings when applying photochemically reactive materials exceeded 8 pounds per hour and/or 40 pounds per day, and the actual organic compound emissions for each such hour or day.

A copy of such record shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance(s) occurred.

5. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services which specify the total OC emissions from emissions unit K008 for the previous calendar year. These reports shall be submitted by January 31 of each year.
6. The permittee shall submit quarterly deviation reports which identify any exceedance of the rolling, 12-month OC input limitation in term B.1.

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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.

7. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the average hourly organic compound emissions exceeded 3 pounds per hour when applying coatings to non-metal parts which are oven-cured, and the actual average hourly organic compound emissions for each such day.
 - b. An identification of each day during which the organic compound emissions exceeded 15 pounds per day when applying coatings to non-metal parts which are oven-cured, and the actual organic compound emissions for each such day.

A copy of such record shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance(s) occurred.

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E. Testing Requirements

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

- a. Emissions Limitation

8 lbs OC emissions/hr and 40 lbs/day when applying PRM coatings on non-metal parts

Applicable Compliance Method

Compliance with the hourly OC emissions limitation shall be demonstrated by the record keeping requirement in term and condition C.1 and C.3.

- b. Emissions Limitation

434.5 lbs OC emissions/day

Applicable Compliance Method

Compliance with the daily OC emissions limitation shall be demonstrated by the record keeping requirement in term and condition C.1.

- c. Emissions Limitation

3 lbs OC emissions/hr when applying coatings on non-metal parts and oven drying the parts

15 lbs OC emissions/day when applying coatings on non-metal parts and oven drying the parts

Applicable Compliance Method

Compliance with the hourly OC emissions limitation shall be demonstrated by the record keeping requirement in term and condition C.6.

- d. Emissions Limitation

31.5 tons per year (TPY) OC emissions, based upon a rolling, 12-month summation

Applicable Compliance Method

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Compliance with the annual OC emissions limitation shall be demonstrated by the record keeping in term and condition C.2.

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e. VOC Content Limitation

3.5 pounds VOC per gallon of extreme performance coating, excluding water and exempt solvents of each coating applied to metal parts;

3.0 pounds VOC per gallon of miscellaneous metal coating, excluding water and exempt solvents of each coating applied to metal parts

Applicable Compliance Method

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.

f. Material Usage Limitations

434.5 pounds per day OC input

63,000 pounds per year OC input;

Applicable Compliance Method

Compliance with the OC input limitations in terms and conditions B.1 shall be demonstrated by the record keeping in terms and conditions C.1 and C.2.

g. Emission Limitation:

9.9 TPY for any single HAP and 24.9 TPY for combined HAPs from the facility per term and condition A.2.b.

Applicable Compliance Method:

Compliance with the HAP emission limitations will be determined by the record keeping requirements specified in term and condition C.4.

F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A., B., C.1, C.2, C.3, C.4, C.6, D. and E.

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2. This terms and conditions of this permit to install supercede the terms and conditions for emissions unit K008 in Permit To Install 14-04188 as issued December 5, 1996.