



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

Lazarus Gov. Center

**RE: DRAFT PERMIT TO INSTALL
HAMILTON COUNTY
Application No: 14-04868**

CERTIFIED MAIL

DATE: 2/16/00

F & M Mafco
Tom Ball
9149 Dry Fork Rd
Harrison, OH 45030

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

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$200** will be due. Please do not submit any payment now.

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

Very truly yours,

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

CC: USEPA
Kentucky

HCDES
Indiana

OH-KY-IN Reg Coun of Govt



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Permit To Install
Terms and Conditions**

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

DRAFT PERMIT TO INSTALL 14-04868

Application Number: 14-04868
APS Premise Number: 1431224051
Permit Fee: **To be entered upon final issuance**
Name of Facility: F & M Mafo
Person to Contact: Tom Ball
Address: 9149 Dry Fork Rd
Harrison, OH 45030

Location of proposed air contaminant source(s) [emissions unit(s)]:
**9149 Dry Fork Rd
Harrison, Ohio**

Description of proposed emissions unit(s):
Miscellaneous metal parts coating line.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

F & M Mafco

Facility ID: 1431224051

PTI Application: 14-04868

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 Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

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lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

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

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 application must be made to the Director for the installation or modification of any other emissions unit(s).

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 thirty (30) 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>
VOC	13.2

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PTI /

Emissions Unit ID: **K001****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>	<u>Applicable Emissions Limitations/Control Measures</u>
K001 - miscellaneous metal parts coating line	OAC rule 3745-31-05(A)(3)	189.7 lbs. VOC/ day 13.2 TPY VOC
	OAC rule 3745-21-09(U)(1)(c)	3.5 pounds VOC per gallon of coating, excluding water and exempt solvents.
	OAC rule 3745-15-07	See Part I, term A.7.
	OAC rule 3745-31-05(D)	See term A.2.b. and C.2.

2. Additional Terms and Conditions

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of compliance coatings and coating and cleanup material usage limits.
- 2.b The total allowable usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility 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.

- 2.c The VOC content of any cleanup materials shall not exceed 7.36 lbs./gallon.

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B. Operational Restrictions

1. The maximum coating usage for this emissions unit shall not exceed 50 gallons per day and 7000 gallons per year.
2. The maximum cleanup material usage for this emissions unit shall not exceed 2 gallons per day and 250 gallons per year.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. The name and identification number of each coating and cleanup material, as applied;
 - b. The VOC content of each coating (excluding water and exempt solvents), as applied, in pounds per gallon;
 - c. The VOC content of each coating (including water and exempt solvents), as applied, in pounds per gallon;
 - d. The VOC content of each cleanup material, in pounds per gallon;
 - e. The number of gallons (including water and exempt solvents), of each coating employed;
 - f. The number of gallons of each cleanup material employed; and
 - g. The total VOC emissions from all coatings and cleanup materials, in pounds or tons per month $[(c \times e) + (d \times f)]$.
2. The permittee shall collect and record the following information each month for the entire facility:
 - 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)];

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Emissions Unit ID: K001

- 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;

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

- g. The total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied [sum all the individual HAP contents from (f)];
- h. The number of gallons of each cleanup material employed;
- i. The total individual HAP usage for each HAP from all 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 usage 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 usage for each individual HAP emissions**, 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 usage for total combined HAP emissions**, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

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

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

D. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing the use of noncomplying coatings or cleanup materials or exceedances of the coating and/or cleanup material usage limits. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.
2. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP emissions limitations set forth in this permit. The permittee shall submit annual reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year. If no

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exceedances occurred during the reporting period then a report is required stating so.

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3. The permittee shall submit annual reports which identify any exceedance of the annual coating and/or cleanup material usage limitation, as well as corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

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

Emission Limitation:

3.5 pounds VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in term C. In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

2. Emission Limitation:

189.7 lbs VOC/day, 13.2 tons VOC/year.

Applicable Compliance Method:

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

$$\text{lbs VOC/day} = (A \times B) + (C \times D)$$

$$\text{tons VOC/year} = (E \times B \times 0.0005) + (F \times D \times 0.0005)$$

where:

A = daily coating usage, gallons

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Facility ID: 1431224051

Emissions Unit ID: K001

B = VOC content of coatings, pounds per gallon

C = daily cleanup material usage, gallons

D = VOC content of cleanup material, pounds per gallon

E = annual coating usage, gallons

F = annual cleanup material usage, gallons

3. Compliance with the usage limits in term B.1 and B.2 shall be demonstrated by the recordkeeping in term C.1.
4. Compliance with the HAP emission limitation in term A.2.b shall be demonstrated by the recordkeeping in term C.2.

F. Miscellaneous Requirements

1. The following terms and conditions are federally enforceable: A.2.b, C.2, D.2 and E.4.

NEW SOURCE REVIEW FORM B

PTI Number: 14-04868 Facility ID: 1431224051

FACILITY NAME F & M Mafco

FACILITY DESCRIPTION miscellaneous metal parts coating line CITY/TWP Harrison

SIC CODE 7359 SCC CODE 40200101 EMISSIONS UNIT ID K001

EMISSIONS UNIT DESCRIPTION miscellaneous metal parts coating line

DATE INSTALLED 1980

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

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	Non- Attainment	4.03 lbs./hour	4.2	189.7 lbs./day	13.2
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

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

Enter Determination The use of compliance coatings and coating and cleanup material usage limits.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

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

TOXIC AIR CONTAMINANTS

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

AIR TOXICS MODELING PERFORMED*? _____ YES X NO

IDENTIFY THE AIR CONTAMINANTS: Emissions unit installed in 1980

NEW SOURCE REVIEW FORM B

PTI Number: 14-04868 Facility ID: 1431224051

FACILITY NAME F & M Mafco

FACILITY DESCRIPTION miscellaneous metal parts coating line CITY/TWP Harrison

Please describe any hard copy information is being submitted with this recommendation (Please send hard copy information to Pam McGraner, DAPC Central Office - Air Quality Modeling and Planning):

NONE

Please provide any additional permit specific notes as you deem necessary:

Permit Review Narrative
PTI 14-04868

F & M Mafco Inc.
9149 Dry Fork Road
Harrison, Ohio 45030

PN: 1431224051

This permit application is for an existing paint spray booth (emissions unit K001) at F & M Mafco Company in Harrison. F & M Mafco paints large industrial and construction equipment, and typically uses large amounts of paint for each job. Therefore, only compliance coatings will be used. Usage will be limited to 50 gallons per day and 7000 gallons per year.

Applicable rules:

OAC rule 3745-15-07 (air pollution nuisance prohibited)
OAC rule 3745-21-09(U) (surface coating of metal)
OAC rule 3745-31-05 (BAT requirements)

Emissions summary (VOC):

Actual emissions 32.24 lbs/day, 4.20 tons/year
Potential emissions 189.7 lbs/day, 13.2 tons/year
Uncontrolled emissions 189.7 lbs/day, 13.2 tons/year

BAT determination:

Compliance with OAC rule 3745-31-05(A)(3) will be demonstrated by the use of compliance coatings and coating and cleanup material usage limits. The toxic policy does not apply since the emissions unit was installed prior to the formation of the toxics policy.

Permit recommendation:

Emissions unit K001 will comply with all applicable rules, therefore approval is recommended.

Permit fee:

F001 - \$200.00 (permit fee is not doubled since this emissions unit was installed prior to 1993)

NEW SOURCE REVIEW FORM B

PTI Number: 14-04868

Facility ID: 1431224051

FACILITY NAME F & M Mafco

FACILITY DESCRIPTION miscellaneous metal parts coating lineCITY/TWP Harrison**Total \$200.00**

Prepared by: Peter Sturdevant

Date prepared: December 28, 1999

Permit To Install Synthetic Minor Write-UpF & M Mafco Inc.
PTI 14-04868A. Source Description

F & M Mafco has submitted a permit application for an existing painting operation (K001), installed in 1980. F & M Mafco paints large-scale industrial and construction equipment prior to sale or lease.

B. Facility Emissions and Attainment Status

F & M Mafco has no existing permits, and will be classified as a minor facility for VOC. Hamilton County is in attainment for Particulates, Sulfur Dioxide, Nitrogen Oxides and Carbon Monoxide, and primary non-attainment for Volatile Organic Compounds.

C. New Source Emissions

This PTI will be made a Synthetic Minor by limiting the individual HAP emissions to less than 10 tons per year and the emissions of combined HAPs to less than 25 tons per year on a rolling, 12- month summation. Usage of coatings will also be limited to 50 gallons per day and 7,000 gallons per year. Recordkeeping and reporting requirements will be included in this PTI for compliance purposes.

D. Conclusion

The terms and conditions of PTI 14-04868 will limit individual HAP emissions to less than 10 tons per year and the emissions of combined HAPs to less than 25 tons per year on a rolling, 12- month summation basis. This facility will maintain records of coatings usage, and shall submit exceedance reports. This permit will limit individual HAP emissions to less than 10 tons per year and the combined HAPs to less than 25 tons per year, therefore this facility will not be subject to the Title V requirements.

Please fill in the following for this permit:**TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**PollutantTons Per Year

NEW SOURCE REVIEW FORM B

PTI Number: 14-04868

Facility ID: 1431224051

FACILITY NAME F & M Mafco

FACILITY DESCRIPTION miscellaneous metal parts coating line CITY/TWP Harrison

VOC

13.2