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Facility Name: **Grimes Aerospace/Allied Signal**

Application Number: **05-9529**

Date: **October 30, 1998**

GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. 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.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCES

The proposed source(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed source(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 Ohio Administrative Code (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

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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 applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

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.

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

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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.

PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

SOURCE OPERATION 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 and regulations.

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Grimes Aerospace/Allied Signal** located in **Champaign** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

Ohio
EPA
Source
Number

K009

K008

K008
Cont'd

K010
Cont'd

K009
Cont'd

K010

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		K208		
			Source Identification Description Walk-in booth no. 1 with oven**	
K207				Walk-in booth no. 2 with oven**
K207 Cont'd				
		K207 Cont'd		
		K208 Cont'd		

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booth no. 3
with oven**

Walk-up booth no. 1
with oven**

Walk-up booth
no. 2 with
oven**

Walk-up

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BAT Determination

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
		3745-21-07 (G) (1)		
	Applicable Federal & <u>OAC Rules</u>		3745-21-09 (U) (2) (e)	
3745-31-05				
		3745-21-07 (G) (2)		
			3745-21-07 (G) (1)	
		3745-17-11		
				3745-21-09 (U) (2) (e)
	3745-31-05		3745-21-07 (G) (2)	
3745-21-09 (U) (2) (e)				3745-21-07 (G) (1)
			3745-17-11	
			3745-31-05	

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3745-21-07	(U) (2) (e)			c parts in the curing oven:
(G) (2)			Permit Allowable Mass Emissions and/or Control/Usage Requirements	3 pounds OC/hour, 15 pounds OC/day, 2.74 TPY of OC
	3745-21-07 (G) (1)		The combined OC emissions from K001, K002, K003, K004, K005, K007, K103, K205, K206, R006 and R008 (emissions units previously identified in PTI No. 05-8362) and K008, K009, K010, K207, K208 (new emission units identified in this PTI) shall not exceed 7.0 tons/month and 42.2 tons/rolling 12-month period	When coating non-metal/plastic parts: 8 pounds OC/hour, 40 pounds OC/day, 7.3 TPY of OC
3745-17-11		3745-21-09 (U) (2) (e)		13.0 pounds PM/day, 2.4 TPY PM
3745-31-05	3745-21-07 (G) (2)			The combined OC emissions from K001, K002, K003, K004, K005, K007, K103, K205, K206, R006 and R008 (emissions units previously identified in PTI No. 05-8362) and K008, K009, K010, K207, K208 (new emission units identified in this PTI) shall not exceed 7.0 tons/month and 42.2 tons/rolling 12-month period
	3745-17-11			
	3745-31-05	3745-21-07 (G) (2)		When coating metal: <10 gals coating/day; 0.5 gal/day cleanup; 72.66 pounds VOC/day, 13.26 TPY of VOC
		3745-17-11		When coating non-metal/plastic parts
3745-21-09				

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metal: <10 gals coating /day; 0.5 gal/day cleanup ; 72.66 pounds VOC/day , 13.26 TPY of VOC	parts: 8 pounds OC/hour, 40 pounds OC/day, 7.3 TPY of OC 13.0 pounds PM/day, 2.4 TPY PM The combined OC emissions from K001, K002, K003, K004, K005, K007, K103, K205, K206, R006 and R008 (emissions units previously identified in PTI No. 05-8362) and K008, K009, K010, K207, K208 (new emission units identified in this PTI) shall not exceed 7.0 tons/month and 42.2 tons/rolling 12-month period	When coating metal: <10 gals coating/day; 0.5 gal/day cleanup; 72.66 pounds VOC/day, 13.26 TPY of VOC When curing non-metal/plastic parts in the curing oven: 3 pounds OC/hour, 15 pounds OC/day, 2.74 TPY of OC When coating non-metal/plastic parts: 8 pounds OC/hour, 40 pounds OC/day, 7.3 TPY of OC 13.0 pounds PM/day, 2.4 TPY PM The combined OC emissions from K001, K002, K003, K004, K005, K007, K103, K205, K206, R006 and R008 (emissions units previously identified in PTI No. 05-8362) and K008, K009, K010, K207, K208 (new emission units	identified in this PTI) shall not exceed 7.0 tons/month and 42.2 tons/rolling 12-month period When coating metal: <10 gals coating/day; 0.5 gal/day cleanup; 72.66 pounds VOC/day, 13.26 TPY of VOC When curing non-metal/plastic parts in the curing oven: 3 pounds OC/hour, 15 pounds OC/day, 2.74 TPY of OC When coating non-metal/plastic parts: 8 pounds OC/hour, 40 pounds OC/day, 7.3 TPY of OC 13.0 pounds PM/day, 2.4 TPY PM	The combined OC emissions from K001, K002, K003, K004, K005, K007, K103, K205, R006 and R008 (emissions units previously identified in PTI No. 05-8362) and K008, K009, K010, K207, K208 (emissions units identified in this PTI) shall not exceed 7.0 tons/month and 42.2 tons/rolling 12-month period When coating metal: <10 gals coating/day; 0.5 gal/day cleanup; 72.66 pounds VOC/day, 13.26 TPY of VOC When curing non-metal/plastic parts in the curing oven: 3 pounds OC/hour, 15 pounds OC/day, 2.74 TPY of OC

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When coating non-metal/plastic parts: 8 pounds OC/hour, 40 pounds OC/day, 7.3 TPY of OC				
13.0 pounds PM/day, 2.4 TPY PM				

* Compliance with the specified regulations, the allowable emission limits and Ohio's Air Toxics Policy; coating usage less than 10 gals/day and cleanup less than 0.5 gal/day (when coating metal); recordkeeping; reporting. (This permit authorizes a 4.5 tons/month and 22.2 tons/rolling 12-month period combined allowables associated with K008, K009, K010, K207, K208 above those previously authorized by PTI 05-8362 associated with K001, K002, K003, K004, K005, K007, K103, K205, K206, R006 and R008 (2.5 tons/month, 20 tons/ rolling 12-month period).

** The permittee applied for the installation of 5 new ovens (identified as an Electric Conveyorized Oven, Electric Truck Oven No. 1, Electric Truck Oven No. 2, Walk-in Oven no. 4 and walk-in Oven No. 5). The permittee wants to cure and dry metal/non-metal parts coated in K008, K009, K010, K207 and K208 in all new ovens and existing ones (walk-in ovens Nos.

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1, 2, and 3).

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SUMMARY
 TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
Organic Compounds (which includes VOCs)	42.2
Each individual HAP (facility-wide)	7.5
Total HAPs (facility-wide)	22.5
Particulate matter	12.0

WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

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.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

A. Applicable Emission Limitations and/or Control Requirements

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1. This permit is based on the use of the photochemically reactive materials specified by the permittee in PTI application number 05-9529. In conjunction with best available technology requirements of OAC 3745-31-05, the emission limitations specified in the following table were established in accordance with Ohio EPA's "Air Toxics Policy" and are based on the photochemically reactive material formulation data and the design parameters of the emission unit's exhaust system as specified in the application. Compliance with Ohio EPA's "Air Toxics Policy" was demonstrated based on the following data input to the Screen3 model:

Pollutant	TLV (ug/m ³)	Maximum Hourly Emission Rate (lbs/hr)	Predicted 1 Hour Maximum Ground-Level Concentration (ug/m ³)	Maximum Acceptable Ground-Level Concentration (MAGLC=TLV/42) (ug/m ³)
Xylene	434000	13.84	1087	10333
MEK	590000	13.84	1087	14047.6

NOTE: Air toxic compounds with emission greater than 1 TPY were evaluated. Per the permittee's application, xylene and MEK are the only air toxic compound with emissions exceeding 1 TPY. The TLV for xylene and MEK were obtained from ACGIH's 1997 Handbook. If the TLV for xylene and/or MEK decrease(s) in any future ACGIH Handbook, K008, K009, K010, K207, and K208 shall remain in compliance with the MAGLCs specified above.

2. Any of the following changes may be deemed a modification to the emissions unit and, as such, prior notification to and approval from Ohio EPA's Southwest District Office are required:
 - a. any change in the composition of the coating/cleanup materials, or the use of new photochemically reactive 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 specified

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in the above table;

- b. any change to the emission unit or its exhaust parameters (e.g. increased emission rate, reduction of exhaust gas flow rate, decreased stack height) that would result in an exceedance of the Maximum Acceptable Ground Level Concentration (MAGLC) specified in the above table;
- c. any change in the composition of the coating/cleanup materials, or use of new photochemically reactive materials, that would result in the emission of any of the exempted organic compounds included in the definition of "VOC" [OAC rule 3745-21-01(B)(6)];
- d. any change in the composition of the coating/cleanup materials, or use of new photochemically reactive materials, that would result in an increase in emissions of any "Hazardous Air Pollutants" (HAPS) as defined in OAC 3745-77-01(V); and,
- e. any change to the emission unit or its method of operation that would either require an increase in the emission limitations established by this permit or would otherwise be considered a "modification" as otherwise defined in OAC rule 3745-31-01.

B. Operational Restrictions

1. These emissions units (K008, K009, K010, K207 and K208) are being moved from Greenwood, South Carolina in conjunction with Grimes Aerospace's project to consolidate painting operations. Given Grimes Aerospace maintained usage and emissions records for these emissions units while they were operated in Greenwood, South Carolina, no monthly restrictions are being placed on these emissions units for their first 12 months of operation.
2. **K008, K009, K010, K207 and K208 - Metal Coating Booths with Electric Drying Ovens**
 - a. The permittee shall employ less than 10 gallons of coating per day and less than 0.5 gallon of cleanup per day in each emission unit K008, K009, K010, K207, and K208.

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3. Ovens Associated with K008, K009, K010, K207 and K208

- a. The permittee applied for the installation of 5 new ovens (identified as an Electric Conveyorized Oven, Electric Truck Oven No. 1, Electric Truck Oven No. 2, Walk-in Oven No. 4 and Walk-in Oven No. 5). The permittee wants flexibility to cure non-metal/plastic parts coated in K008, K009, K010, K207 and K208 in all new ovens and existing ones (Walk-in Oven No. 1, Walk-in Oven No. 2, and Walk-in Oven No. 3). Compliance with allowable limits associated with the oven when used for curing of non-metal/plastic parts will be demonstrated as specified in Sections C.3.a., C.3.b. and C.3.c.

4. Hazardous Air Pollutant Facility Emission Limits

- a. The HAP emissions from all emissions units at this facility, including emissions from existing units not listed or specifically addressed in this permit or PTI 05-8362, shall not exceed 7.5 tons per year for any single HAP and 22.5 tons per year for any combination of HAPs, based upon a rolling, 12-month summation of the monthly emissions.

C. Recordkeeping Requirements

1. K008, K009, K010, K207 and K208 - Metal Coating Booths with Electric Drying Ovens

- a. The permittee shall collect and record the following information each month for the purpose of determining the daily VOC emissions:
- i. the name and identification of each coating and cleanup material employed;
 - ii. the number of gallons of each coating and cleanup material employed;
 - iii. the VOC content of each cleanup material, in pounds per gallon;
 - iv. the VOC content of each coating, as applied, in pounds per gallon; and,
 - v. the total VOC emissions from all coatings and cleanup materials employed, in pounds per day.

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- b. The permittee shall collect and record the following information each month for the purpose of determining the monthly VOC emissions and the annual VOC emissions per rolling 12-month period:
 - i. the name and identification of each cleanup material employed;
 - ii. the number of gallons of each cleanup material employed;
 - iii. the VOC content of each cleanup material, in pounds per gallon;
 - iv. the VOC content of each coating, as applied, in pounds per gallon;
 - v. the total combined organic compound emissions from all coatings and cleanup materials employed, in tons per month; and
 - vi. the total VOC emissions from all coatings and cleanup materials employed, in tons per rolling 12-month period.

2. K008, K009, K010, K207 and K208 - Non-metal/Plastic Parts Coating Booths with Ovens

- a. For purposes of calculating the OC emission rates for these coating booths (identified above) and associated ovens used for curing, the permittee shall utilize a value of 80 percent as the maximum percentage of the OCs employed in these emissions units that are emitted. The remaining 20 percent of the OCs employed in these emissions units shall be considered to be the emissions for the associated ovens. This "split" of OC emissions between these emissions units and the associated ovens is based upon engineering studies conducted by the permittee and information provided by one of the permittee's coating suppliers.
- b. The permittee shall collect and record the following information for each day for the coating operations:

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- i. the company identification for each coating and cleanup material employed;
- ii. the number of gallons of each coating and cleanup material employed;
- iii. the organic compound content of each coating and cleanup material, in pounds per gallon;
- iv. the total organic compound emission rate for all coatings and cleanup materials, in pounds per day;
- v. the total potential (prior to applying the booth/oven split) daily OC emission rate for all coatings and cleanup materials, in pounds per day;
- vi. the total potential daily OC emission rate for all coatings and cleanup materials multiplied by the maximum percentage of the emissions associated with these emissions units (as defined in condition C.2.a. of this permit), in pounds per day;
- vii. the total organic compound emission rate for all coatings and cleanup materials, in pounds per day;
- viii. the total number of hours the emissions unit was in operation; and,

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- ix. the average hourly organic compound emission rate for all coatings and cleanup materials, i.e., (vii.)/(viii.), in pounds per hour (average).

[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 reactive" are based upon OAC rule 3745-21-01(C)(5).]

- c. The permittee shall collect and record the following information each month, for all of the coatings and cleanup materials, for each emissions unit for purposes of determining the monthly VOC emissions and annual VOC emissions per rolling 12-month period:
 - i. the company identification for each organic compound material employed;
 - ii. the number of gallons of each organic compound material employed;
 - iii. the organic compound content of each coating and cleanup material employed, in pounds per gallon;
 - iv. the total potential (prior to applying the booth/oven split) monthly OC emission rate for all coatings and cleanup materials, in tons per month;
 - v. the total potential (prior to applying the booth/oven split) monthly OC emission rate for all coatings and cleanup materials, in tons per rolling 12-month period;
 - vi. the total potential monthly OC emission rate for all coatings and cleanup materials multiplied by the maximum percentage of the emissions associated with these emissions units (as defined in condition C.2.a. of this permit), in tons per month;
 - vii. the total potential monthly OC emission rate for all coatings and cleanup materials multiplied by the maximum percentage of the emissions associated with these

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emissions units (as defined in B.2.a. of this permit), in tons per rolling 12-month period;

viii. the total combined organic compound emissions from all coatings and cleanup materials employed, in tons per month; and,

ix. the total combined organic compound emissions from all coatings and cleanup materials employed, in tons per rolling 12-month period.

3. Ovens (When used for Curing) Associated with K008, K009, K010, K207 and K208 - Non-metal/Plastic Parts Coating Booths

a. For purposes of calculating the OC emission rates for these ovens (when used for curing) and associated coating booths identified above, the permittee shall utilize a value of 80 percent as the maximum percentage of the OCs employed in the coating booths that are emitted from the coating booths. The remaining 20 percent of the OCs employed in the coating booths shall be considered to be the emissions for these ovens. This "split" of OC emissions between these ovens and the associated coating booths is based upon engineering studies conducted by the permittee and information provided by one of the permittee's coating suppliers.

b. The permittee shall collect and record the following information for each day, for each of the ovens (when used for curing):

i. an identification of the oven;

ii. the total potential (prior to the booth/oven "split") uncontrolled daily OC emission rate for all coatings employed in the coating operations associated with these ovens, multiplied by the maximum percentage of the emissions units (as defined in Section C.3.a. of this permit), in pounds per day;

iii. the total numbers of hours these ovens were in operation (this number should be the same as the number of hours the associated coating operation was in operation); and,

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- iv. the average hourly OC emission rate, i.e., (ii.)/(iii.), in pounds per hour (average).
- c. The permittee shall collect and record the following information each month, for each of the ovens (when used for curing) for purposes of
- determining the monthly OC emissions and annual OC emissions per rolling 12-month period:
- i. an identification of the oven;
 - ii. the total potential (prior to the booth/oven "split") uncontrolled monthly OC emission rate for all coatings employed in the coating operations associated with these ovens, multiplied by the maximum percentage of the emissions units (as defined in Section C.3.a. of this permit), in tons per month; and,
 - iii. the total potential (prior to the booth/oven "split") uncontrolled monthly OC emission rate for all coatings employed in the coating operations associated with these ovens, multiplied by the maximum percentage of the emissions units (as defined in Section C.3.a. of this permit), in tons per rolling 12-month period.

4. Hazardous Air Pollutants (HAP)

- a. The permittee shall collect and record the following information each month for all emissions units at this facility, including emissions from existing units not listed or specifically addressed in this permit or PTI 05-8362:
- i. the name and identification of each coating, as applied;
 - ii. the individual HAP¹ content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
 - iii. the total combined HAP content of each coating in combined HAPs per gallon of coating, as applied (sum all the individual HAP contents of ii.);
 - iv. the number of gallons of each coating employed;
 - v. the name and identification number of each cleanup

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- material, as applied;
- vi. the individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon of cleanup material, as applied;
 - vii. the total combined HAP content of each cleanup material in combined HAPs per gallon of cleanup material, as applied (sum all the individual HAP contents of vi.)
 - viii. the number of gallons of each cleanup material employed;
 - ix. the name and identification number of other HAP-emitting materials;
 - x. the individual HAP content for each HAP of other HAP-containing materials;
 - xi. the total combined HAP content of other HAP-containing materials (i.e., sum of all the individual HAP contents of x.);
 - xii. the amount of other HAP-containing materials employed (pounds, gallons, etc.);
 - xiii. 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 ii. times iv. for each coating and the sum of vi. times viii. for each cleanup material and the sum of x. times xii. for each other HAP-containing materials); and,
 - xiv. the total combined HAP emissions from all coatings, cleanup and other HAP-containing materials employed, in pounds or tons per month (the sum of iii. times iv. for each coating plus the sum of vii. times viii. for each cleanup material plus the sum of xi. times xii. for other HAP-containing materials).

¹A Listing of the Hazardous Air Pollutants (HAPs) can be found in

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Section 112 (b) of the Clean Air Act or can be obtained by contacting your Ohio EPA, Southwest District Office contact. Material Safety Data Sheets (MSDS) typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on a line-by-line basis.

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

D. Reporting Requirements

1. K008, K009, K010, K207 and K208 - Non-metal/Plastic Parts Coating Booths with Ovens

- a. The permittee shall submit deviation (excursion) reports which include the following information:
 - i. an identification of each day during which the average hourly total organic compound emissions exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day;
 - ii. an identification of each day during which the total organic compound emissions exceeded 40 pounds per day, and the actual organic compound emissions for each such day; and
 - iii. an identification of each day during which the maximum percentage of the OCs employed in the coating booths that are emitted from the coating booths exceeds 80 percent.

2. K008, K009, K010, K207 and K208 - Metal Coating Booths with

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Electric Drying Ovens

- a. The permittee shall notify the Director (Ohio EPA, Southwest District Office) in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit of 10 gallons per day. The notification shall include a copy of such record and/or records and shall be sent to the Director (Ohio EPA, Southwest District Office) within 45 days after the exceedance(s) occur(s).

3. Ovens (When used for Curing) Associated with K008, K009, K010, K207 and K208 - Non-metal/Plastic Parts Coating Booths

- a. The permittee shall submit deviation (excursion) reports which include the following information:
 - i. an identification each day during which the average hourly OC emissions exceeded 3 pounds per hour, and the actual average hourly OC emissions for each such day;
 - ii. an identification of each day during which the OC emissions exceeded 15 pounds per day, and the actual OC emissions for each such day; and,
 - iii. an identification of each day during which the maximum percentage of the remaining OCs employed in the coating booths that are emitted from the ovens exceeds 20 percent.

4. Plant-Wide Coating Operation: K001, K002, K003, K004, K005, K007, K103, K205, K206, R006 and R008 (emissions units previously identified in PTI 05-8362) and K008, K009, K010, K207 and K208 (new emissions units identified in this PTI)

- a. The permittee shall submit deviation (excursion) reports which include the following information:
 - i. an identification of when the monthly OC emissions exceeded 7.0 tons, and the actual OC emissions for that month; and,
 - ii. an identification of when the rolling 12-month OC emissions exceeded 42.2 tons, and the actual OC emissions for that rolling 12-month period.

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5. Facility

- a. The permittee shall notify the Director (Ohio EPA Southwest District Office) in writing of any record showing exceedances of 7.5 tons per year for any single HAP and 22.5 tons per year for any combination of HAPs for the facility.
- b. The permittee shall submit required reports in the following manner unless it is specified otherwise:
 - i. reports of any required monitoring and/or recordkeeping information shall be submitted to the Ohio EPA, Southwest District Office; and,
 - ii. 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 the Ohio EPA, Southwest District Office. 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.)

E. Testing Requirements

1. Compliance with the emission limitations in the Emission Summary of this permit shall be determined with the following methods:
 - a. **K008, K009, K010, K207 and K208 - Metal Coating Booths with Electric Drying Ovens**

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Emission Limitation

Less than 10 gallons of coating per day; 0.5 gallons of cleanup per day; 72.66 pounds VOC/day; the combined OC emissions from units K001, K002, K003, K004, K005, K007, K103, K205, K206, R006, R008 (emissions units previously identified in PTI 05-8362) and K008, K009, K010, K207, K208 (new emissions units identified in this PTI) shall not exceed 7.0 tons/month; 42.2 tons per rolling 12-month period.

Applicable Compliance Method

The specified daily and monthly recordkeeping (in Sections C.1.a. and B.1.). For the annual OC limit, compliance shall be based upon the recordkeeping specified in Section C.1.b. and shall be the sum of the monthly OC emission rates for 12 rolling months.

USEPA Method 24 shall be used to determine the VOC contents for 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 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.

b. **K008, K009, K010, K207 and K208 - Non-metal/Plastic Parts Coating Booths with Ovens**

Emissions Limitation

8 pounds OC/hour; 40 pounds OC/day; the combined OC emissions from units K001, K002, K003, K004, K005, K007, K103, K205, K206, R006, R008 (emissions units previously identified in PTI 05-8362) and K008, K009, K010, K207, K208 (new emissions units identified in this PTI) shall not exceed 7.0 tons/month; 42.2 tons per rolling 12-month period.

Applicable Compliance Method

The specified daily and monthly recordkeeping (in Section C.2.b. and C.2.c.) for emissions units K008, K009, K010, K207, K208. Formulation data or USEPA Method 24 shall be used to determine

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the organic compound contents of the coatings.

For the annual OC limit, compliance shall be based upon the recordkeeping specified in Section C.2.c. and shall be the sum of the monthly OC emission rates for 12 rolling months.

c. **Ovens (When used for Curing) Associated with K008, K009, K010, K207 and K208 - Non-metal/Plastic Parts Coating Booths**

Emission Limitation

3 pounds OC/hour; 15 pounds OC/day; the combined OC emissions from units K001, K002, K003, K004, K005, K007, K103, K205, K206, R006, R008 (emissions units previously identified in PTI 05-8362) and K008, K009, K010, K207, K208 (new emissions units identified in this PTI) shall not exceed 7.0 tons/month; 42.2 tons per rolling 12-month period.

Applicable Compliance Method

The specified daily and monthly recordkeeping (in Sections C.3.b. and C.3.c.) for emissions units K008, K009, K010, K207, K208. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings.

For the annual OC limit, compliance shall be based upon the recordkeeping specified in Section C.3.c. and shall be the sum of the monthly OC emission rates for 12 rolling months.

d. **Particulate Emission Limitation Associated with K008, K009, K010, K207 and K208**

Emission Limitation

13.0 pounds PM/day; 5 percent visible emission opacity limit as a three minute average.

Applicable Compliance Method

Compliance with the PM emissions shall be determined in

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accordance with the test method and procedures in OAC rule 3745-17-03 (B)(10). In the absence of Ohio EPA requiring such testing, the permittee may calculate actual PM emission rates for the unit utilizing the following equation for each coating employed:

$$E = A \times (1 - TE) \times (1 - CE)$$

where

E = actual particulate emission rate (pounds per day)

A = coating solids usage rate [gallons coating employed (gal/day) x coating density x wt. percent solids]

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids employed

CE = control efficiency of the control equipment (filters)

The installation of particulate filter(s) and their operation according to manufacturers' recommendations shall be deemed to ensure compliance with the PM emission rates.

If required, compliance with the 5 percent visible emission limit shall be determined by visible emission evaluations performed in accordance with procedures specified in OAC rule 3745-17-03(B)(1) using the methods and procedures specified in USEPA Reference Method 9.

Emission Limitation

2.4 TPY PM; 5 percent visible emission opacity limit as a three minute average.

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Applicable Compliance Method

Compliance with the PM emissions shall be determined in accordance with the test method and procedures in OAC rule 3745-17-03 (B)(10). In the absence of Ohio EPA requiring such testing, the permittee may calculate actual PM emission rates for the unit utilizing the following equation for each coating employed:

$$E = A \times (1 - TE) \times (1 - CE)$$

where

E = actual particulate emission rate (tons per year)

A = (Coating solids usage rate) = Gallons coating employed (gal/yr) x coating density x wt. percent solids

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids employed

CE = control efficiency of the control equipment (filters)

The installation of particulate filter(s) and their operation according to manufacturers' recommendations shall be deemed to ensure compliance with the PM emission rates.

If required, compliance with the 5 percent visible emission limit shall be determined by visible emission evaluations performed in accordance with procedures specified in OAC rule 3745-17-03(B)(1) using the methods and procedures specified in USEPA Reference Method 9.