

Facility ID: 1409000646 Issuance type: Final State Permit To Operate

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In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1409000646 Emissions Unit ID: P009 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
P009- Solvent Wipe Cleaning Operation	OAC rule 3745-31-05(A)(3) (14-05123)	<p>Volatile Organic Compound (VOC) emissions shall not exceed 205 pounds per day.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2) and OAC rule 3745-31-05(C).</p> <p>See terms A.2.d and A.2.e.</p>
	OAC rule 3745-31-05(C) (Synthetic Minor to avoid RACT)	VOC emissions from emissions units R003, R005 and P009 combined, shall not exceed 24.9 tons per year based on a rolling 12-month summation.
	OAC rule 3745-21-07(G)(2)	See terms A.2.a and A.2.c. VOC emissions shall not exceed 8 pounds per hour and 40 pounds per day when using photochemically reactive materials.

2. Additional Terms and Conditions

- (a) The total volatile organic compound (VOC) emissions from all the aerospace manufacturing and rework operations and associated cleaning and washoff processes located at this facility shall not exceed 24.9 TPY based on a rolling, 12-month summation. The 24.9 TPY rolling, 12-month summation included emissions from wiping non-metal and metal parts. "Coating" means a protective, decorative, or functional material applied in a thin layer to a surface. Such materials include, but are not limited to, paints, topcoats, varnishes, sealers, stains, washcoats, basecoats, inks and temporary protective coatings. "Cleaning material" means organic solvent used to remove coating materials from equipment used in aerospace manufacturing and rework operations. "Washoff material" means organic solvent used to remove coating from a substrate. "Volatile organic compound" means any volatile organic compound as defined in OAC rule 3745-21-01(B)(6). Compliance with OAC rule 3745-31-05(A)(3) shall be determined by compliance with the emission limitations.

The actual emissions of hazardous air pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units P009, R003, R005, all de minimus emissions units (as defined in OAC rule 3745-15-05), all emissions units exempt from the requirement to obtain a permit to install pursuant to OAC rule 3745-31-03 and future to be installed air contaminant sources, combined, 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.

On any day when using (employing) any photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] for solvent wipe cleaning, the VOC emissions from all organic materials employed that day shall not exceed 8 pounds of VOC per hour and 40 pounds of VOC per day.

On any day when not using any photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] for solvent wipe cleaning, the VOC emissions shall not exceed 205 pounds of VOC per day.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. The company identification for each organic cleanup solvent employed.
 - b. A record of each organic cleanup solvent employed in this emissions unit, indicating whether or not the liquid organic material is a photochemically reactive material as identified in OAC rule 3745-21-01(C)(5).
 - c. A statement for each day that says whether a cleanup solvent was employed in this emissions unit that contained a photochemically reactive material.
 - d. The number of gallons of each organic cleanup solvent employed.
 - e. The VOC content of each organic cleanup solvent employed, in pounds per gallon.
 - f. The total organic compound emission rate for all organic cleanup solvents employed, in pounds per day [calculated by taking the sum of (d) times (e) for each organic cleanup solvent employed].
 - g. The total number of hours the emissions unit was in operation.
 - h. The total organic compound emission rate for all organic cleanup solvents employed, in pounds per hour [calculated by taking (f) divided (g)] when using any photochemically reactive material.

In addition, these records shall be summarized at the end of each year to calculate the annual VOC emissions.
2. The permittee shall collect and record the following information each month for the emissions units identified in term A.2.c:
 - a. The name and identification number of each coating, as applied.
 - b. The individual 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 and 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 for individual HAP emissions for each HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
 - l. The updated rolling, 12-month summation 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 Ohio EPA field office or local air agency contact. This information does not have to be kept on a line-by-line basis.
3. The permittee shall collect and record the following information each month for emissions units R003, R005 and P009 combined:
 - a. The name and identification number of each coating, cleaning and washoff material employed.
 - b. The volume, in gallons, of each coating, cleaning and washoff material employed.
 - c. The VOC content of each coating, cleaning and washoff material, in pounds of VOC per gallon, as applied.
 - d. The amount of VOC emitted for all coating, cleaning and washoff materials employed, in pounds per month.
 - e. The rolling 12-month* usage for coating, cleaning and washoff materials, in gallons.
 - f. The rolling 12-month* VOC emission rate in tons per year (in tons, rounded off to one decimal place).

*A rolling 12-month period includes the previous set of 12 months.
 - g. Monthly records shall be completed within 15 days following the end of each calendar month.

The records shall be maintained for five years, and upon request the permittee shall submit such records to the appropriate Ohio EPA District Office or local air agency.

4. The permittee shall maintain for this facility all purchase orders and invoices of VOC - containing materials. The permittee shall retain such purchase orders and invoices for at least five years from the date of issuance. Upon request, the permittee shall make available to the Director of the Ohio EPA, or an authorized representative of the Director, such purchase orders and invoices for use in confirming the general accuracy of the records maintained and the reports submitted regarding material usage.
The permittee shall maintain for this facility all purchase orders and invoices of VOC - containing materials. The permittee shall retain such purchase orders and invoices for at least five years from the date of issuance. Upon request, the permittee shall make available to the Director of the Ohio EPA, or an authorized representative of the Director, such purchase orders and invoices for use in confirming the general accuracy of the records maintained and the reports submitted regarding material usage.
5. The permit to install for this emissions unit P009 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: methyl ethyl ketone

TLV (ug/m3): 589,800

Maximum Hourly Emission Rate (lbs/hr): 9.26

Predicted 1 Hour Maximum Ground-level Concentration (ug/m3): 691.2

Maximum Acceptable Ground-level Concentration (MAGLC) (ug/m3): 14,043

The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(d), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. Changes that can affect the parameters used in applying 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 or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
- 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.).

The permittee shall submit annual reports that describe any changes to this emissions unit which affect the air toxic modeling. If no changes were made during the year, then a report shall be submitted stating that no changes were made. This report is due by January 31 of each year and shall cover the previous calendar year.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month HAP emission limitations. If no deviations occurred during the reporting period, the permittee shall state so in the report.
2. The permittee shall submit deviation reports identifying each day during which any photochemically reactive material [as defined in OAC 3745-21-01(C)(5)] was employed in this emissions unit and the average hourly VOC emission rate exceeded 8 pounds per hour.
3. The permittee shall submit a deviation report identifying each day during which any photochemically reactive material [as defined in OAC 3745-21-01(C)(5)] was employed in this emissions unit and the VOC emission rate exceeded 40 pounds per day.
4. The permittee shall submit deviation reports identifying each day during which non-photochemically reactive materials were employed in this emissions unit and the VOC emission rate exceeded 205 pounds per day.
5. If the facility (emissions units R003, R005 and P009) has a rolling, 12 month record that exceeds 24.9 tons of VOC from combined operations associated with aerospace manufacturing and rework operations the permittee shall submit the following:
 - a. Within 30 days after the end of that rolling, 12-month period in which the exceedance occurred, a notification to the Hamilton County Department of Environmental Services that the VOC emission limit was exceeded .
 - b. Within three months after the end of that rolling, 12-month period in which the exceedance occurred, a compliance plan to the Hamilton County Department of Environmental Services to comply with the presumptive RACT standards specified within USEPA document 453/R-97-004 " Control of Volatile Organic Compound Emissions from Aerospace Manufacturing and Rework Operations" (December 1997). Any divergence from the presumptive RACT standards and the model rule provided within that document shall be described at the time of the submittal of the 3-month compliance plan. Compliance with the presumptive RACT standards is to be achieved within 12 months after the rolling, 12-month period exceedance, unless otherwise requested by the permittee and approved by USEPA as a revision to Ohio's state implementation plan for ozone.
 - c. Exceeding the 24.9 TPY VOC/OC limit is a violation for each day of the last month of each 12 month period in which the 24.9 TPY limit is exceeded regardless of whether a compliance plan is submitted.
6. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions.

E. Testing Requirements

1. Compliance with the organic compound emission limitations of 8 pounds per hour and 40 pounds per day shall be demonstrated by the recordkeeping requirements in section C.1.
2. Compliance with the HAP emission limitations in term A.2.c shall be demonstrated by the recordkeeping in section C.2.
3. Compliance with the emission limitation of 24.9 TPY of VOC from emissions units R003, R005 and P009 combined based on a rolling 12-month summation shall be demonstrated by the recordkeeping requirements in section C.3.
4. OAC rule 3745-21-10(B) shall be used to determine the VOC contents of the coatings, cleaning and washoff materials employed in this emissions unit. 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, cleaning or washoff material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for the coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.
5. Compliance with the 205 pounds of VOC per day limitation shall be demonstrated by the recordkeeping requirements in section C.1.

F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A, B, C.1-C.4, D and E.
2. This Federally Enforceable Permit limits the potential emissions of organic compounds from the aerospace manufacturing and rework processes and associated cleaning and washoff processes located at this facility to no more than 24.9 TPY during any rolling, 12-month period. Should VOC/OC emissions from the aerospace manufacturing and rework processes and associated cleaning and washoff processes exceed 24.9 TPY during any rolling, 12-month period, this facility should notify the Hamilton County Department of Environmental Services within 30 days.