

Facility ID: 1409000654 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

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.

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

Facility ID: 1409000654 Emissions Unit ID: R001 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>
R001 - Dip Coating No. 1	OAC rule 3745-31-05(A)(3) (PTI 14-05826)	Volatile Organic Compound (VOC) emissions shall not exceed 13.11 pounds per hour for coatings and cleanup material when coating miscellaneous metal parts. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2), OAC rule 3745-21-09(U)(2)(e)(ii) and OAC rule 3745-31-05(C). See terms A.2.b, A.2.c, B.1, and B.2.
	OAC rule 3745-31-05(C) Synthetic Minor to avoid 40 CFR 63, Subpart MMMM, Title V permitting and non-attainment new source review for VOC	See terms A.2.a and A.2.f.
	OAC rule 3745-21-09(U)(2)(e)(ii)	See term B.3.
	OAC 3745-21-07(G)(2)	See term B.4.

2. Additional Terms and Conditions

- (a) The emissions of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from emissions units R001 (Dip Coating Number 1), R002 (Dip Coating Number 2), R003 (Dip Coating Number 3), R004 (Dip Coating Number 4), R005 (Dip Coating Number 5), R006 (Dip Coating Number 6), R008 (Rotary Coater Number 1), R009 (Rotary Coater Number 2), R010 (Automatic Coater Number 1), R011 (Automated Coater number 2), R012 (Automated Nut Coater) and R013 (Dip Coating associated with Tumbling) including any de minimus air contaminant sources as defined in OAC rule 3745-15-05 and any permanent exemption air contaminant sources installed subsequent to the issuance of this permit 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 volatile organic compound (VOC) content, as applied, for each coating employed in this emissions unit shall not exceed 9.0 pounds of VOC per gallon of coating.

The VOC content of each cleanup material shall not exceed 7.75 pounds of VOC per gallon. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the VOC content limitations, usage limitations, and the emission limitations. The pounds per hour VOC emission limitation is based on the potential to emit of the emissions unit when coating miscellaneous metal parts. Therefore no hourly recordkeeping is required to determine compliance with this emission limitation. The emissions of Volatile Organic Compound (VOC) from emissions units R001 (Dip Coating Number 1), R002 (Dip Coating Number 2), R003 (Dip Coating Number 3), R004 (Dip Coating Number 4), R005 (Dip Coating Number 5), R006 (Dip Coating Number 6), R008 (Rotary Coater Number 1), R009 (Rotary Coater Number 2), R010 (Automatic Coater Number 1), R011 (Automated Coater number 2), R012 (Automated Nut Coater) and R013 (Dip Coating associated with Tumbling) combined shall not exceed 51.30 tons. Compliance with the above limitation shall be based on a rolling, 12 month-summation.

B. Operational Restrictions

1. The maximum annual coating usage for emissions units R001-R006 and R008-R013 combined shall not exceed 5200 gallons after subtracting out the amount of waste recovered. Compliance with the above limitation shall be based on a rolling, 12-month summation.
2. The maximum annual cleanup material usage for emissions units R001-R006 and R008-R013 combined shall not exceed 7200 gallons after subtracting out the amount of waste recovered. Compliance with the above limitation shall be based on a rolling, 12-month summation.
3. The maximum daily coating usage for this emissions unit shall not exceed 3 gallons, as applied, when coating miscellaneous metal parts.
4. On any day during which a non-metal part is coated in this emission unit using photochemically reactive material as defined in OAC rule 3745-21-01(C)(5), organic compound emissions shall not exceed forty pounds in any one day and eight pounds in any one hour.

C. Monitoring and/or Record Keeping Requirements

1. On any day during which a non-metal part is coated in this emissions unit using photochemically reactive material as defined in OAC rule 3745-21-01(C)(5) the permittee shall collect and record the following information:
 - a. The name and identification number of each coating employed.
 - b. The volume, in gallons, of each coating employed.
 - c. The total volume, in gallons, of all coatings employed.
 - d. The Organic Compound (OC) content of each coating, in pounds per gallon, as applied.
 - e. The total OC emissions from coatings in pounds (b x d).
 - f. The name and identification number of each cleanup material employed.
 - g. The volume, in gallons, of each cleanup material employed.
 - h. The OC content of each cleanup material employed.
 - i. The total OC emissions from cleanup materials employed in pounds (g x h).
 - j. The total OC emissions from coatings and cleanup materials employed (e + i).
 - k. The hours of operation of the emissions unit.
 - l. The hourly OC emission rate for all coating and cleanup materials (j divided by k).
2. The permittee shall collect and record the following information each day for this emissions unit when coating miscellaneous metal parts:
 - a. The name and identification number of each coating employed.
 - b. The volume, in gallons, of each coating employed, as applied.
3. This permittee shall collect and record the following information each month for the emissions units identified in term A.2.f:
 - a. The name and identification number of each coating employed.
 - b. The volume, in gallons, of each coating employed.
 - c. The total volume, in gallons, of all coatings employed.
 - d. The VOC content of each coating, in pounds per gallon, as applied.
 - e. The total VOC emissions from coatings in pounds per month (b x d).
 - f. The name and identification number of each cleanup material employed.
 - g. The volume, in gallons, of each cleanup material employed.
 - h. The VOC content of each cleanup material employed.
 - i. The total VOC emissions from cleanup materials employed in pounds per month (g x h).
 - j. The total VOC emissions from coatings and cleanup materials employed per month (e + i).

- k. The updated rolling twelve month total combined coatings and cleanup materials employed, in gallons.
- l. The updated rolling twelve month total combined VOC emissions from all coatings and cleanup materials employed, in pounds or tons.
4. The permittee shall collect and record the following information each month for the emissions units identified in term and condition A.2.a:
- a. The name and identification number of each coating used.
 - 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 organic cleanup material employed.
 - f. The individual HAP content for each HAP of each organic cleanup material in pounds of individual HAP per gallon of organic cleanup material, as applied.
 - g. The total combined HAP content of each organic cleanup material in pounds of combined HAPs per gallon of organic cleanup material, as applied [sum all the individual HAP contents from (f)].
 - h. The number of gallons of each organic cleanup material employed.
 - i. The total individual HAP emissions for each HAP from all coatings and organic 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 organic cleanup material].
 - j. The total combined HAP emissions from all coatings and organic 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 organic cleanup material].
 - k. The updated rolling twelve month total of the total individual HAP emissions for each HAP from all coating and cleanup material employed, in pounds or tons.
 - l. The updated rolling twelve month total of the total combined HAPs from all coating and cleanup material employed, in pounds or tons.

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.

5. The permit to install for this emissions was evaluated based on the actual materials (typically coatings and cleanup 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: Toluene
 TLV (ug/m3): 188,405
 Maximum Hourly Emission Rate (lbs/hr): 3.42
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 399
 MAGLC (ug/m3): 4486
 Pollutant: Trichloroethylene
 TLV (ug/m3): 268,712
 Maximum Hourly Emission Rate (lbs/hr): 3.42
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 399
 MAGLC (ug/m3): 6398

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 (typically for coatings or cleanup materials), 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.

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 (i.e., VOC contents). 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.
2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing the use of more than three gallons of coatings 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.
3. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing an exceedance of eight pounds of OC emissions in any one hour or forty pounds in any one day when coating non-metal parts and using photochemically reactive material as defined in OAC rule 3745-21-01 (C)(5). 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.
4. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month VOC emission limitation set forth in term A.2.f or the coating or cleanup usage limitation in terms B.1 and B.2. 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.
5. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month HAP emission limitations set forth in term A.2.a. 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.
6. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit unless otherwise specified.

E. Testing Requirements

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

Emission Limitation:

Volatile Organic Compound (VOC) emissions shall not exceed 13.11 pounds per hour for coatings and cleanup material when coating miscellaneous metal parts.

Applicable Compliance Method:

The hourly VOC emission limitation was determined by multiplying the maximum VOC content, as applied, for coating and cleanup material identified in terms A.2.b and A.2.c by the maximum hourly application rates identified in Permit To Install application number 14-05826 and combining hourly coating and cleanup emissions. Record keeping is not required to determine compliance as the hourly emission limitation is based on the emissions unit's maximum potential usage.

For coatings- 9.0 pounds of VOC per gallon x 0.38 gallon of coating per hour.

For cleanup- 7.75 pounds of VOC per gallon x 1.25 gallons per hour.

Emission Limitation:

The emissions of VOC from emissions units R001 through R006 and R008 through R013, combined shall not exceed 51.30 tons per year based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month summation of VOC emission limitation shall be determined by adding the annual emissions from coating and cleanup usage. Annual VOC emissions from coating shall be determined by multiplying the VOC content of applied coatings by the rolling, 12-month summation of the usage. Annual VOC emissions from cleanup are determined by multiplying the VOC content of the cleanup by the rolling, 12-month summation of the usage. The annual emissions from the coating and cleanup are then summed and divided by

2000 lbs/ton to determine compliance with the annual emission limitation on a rolling, 12-month summation. Compliance shall be based upon the record keeping requirements as specified in term and condition C.3.

Emission Limitation:

The total allowable emissions of Hazardous Air Pollutants (HAPs) from the emissions units identified in term and condition A.2.a shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs.

Applicable Compliance Method:

Compliance with the HAP emission limitations shall be based on the recordkeeping requirements established in term C.4.

2. USEPA methods 24 and 24A shall be used to determine the VOC content for coatings and cleanup materials. If, pursuant to Method 24, 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 precision statements for Method 24 or 24A.

3. Operational Restriction:

The maximum annual coating usage for emissions units R001-R006 and R008-R013 combined shall not exceed 5200 gallons after subtracting out the amount of waste recovered. Compliance with the above limitation shall be based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the operational restriction in term B.1 shall be determined by the record keeping required in term C.3.

4. Operational Restriction:

The maximum annual cleanup material usage for emission units R001-R006 and R008-R013 combined shall not exceed 7200 gallons after subtracting out the amount of waste recovered. Compliance with the above limitation shall be based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the operational restriction in term B.2 shall be determined by the record keeping required in term C.3.

5. Operational Restriction:

The maximum daily coating usage for this emissions unit shall not exceed 3 gallons, as applied, when coating miscellaneous metal parts.

Applicable Compliance Method:

Compliance with the operational restriction in term B.3 shall be determined by the record keeping required in term C.2.

6. Operational Restriction:

On any day during which a non-metal part is coated in this emissions unit using photochemically reactive material as defined in OAC rule 3745-21-01(C)(5), organic compound emissions shall not exceed forty pounds in any one day nor eight pounds in any one hour.

Applicable Compliance Method:

Compliance with the operational restriction in term B.4 shall be determined by the record keeping required in term C.1.

F. Miscellaneous Requirements

1. The following terms of this permit to install shall be federally enforceable: A, B, C.1, through C.4, D, and E.

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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>
R002 - Dip Coating No. 2	OAC rule 3745-31-05(A)(3) (PTI 14-05826)	Volatile Organic Compound (VOC) emissions shall not exceed 13.11 pounds per hour for coatings and cleanup material when coating miscellaneous metal parts. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2), OAC rule 3745-21-09(U)(2)(e)(ii) and OAC rule 3745-31-05(C).
	OAC rule 3745-31-05(C)	See terms A.2.b, A.2.c, B.1, and B.2.
	Synthetic Minor to avoid 40 CFR 63, Subpart M, Title V permitting and non-attainment new source review for VOC	See terms A.2.a and A.2.f.
	OAC rule 3745-21-09(U)(2)(e)(ii)	See term B.3.
	OAC 3745-21-07(G)(2)	See term B.4.

- 2. **Additional Terms and Conditions**

- (a) The emissions of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from emissions units R001 (Dip Coating Number 1), R002 (Dip Coating Number 2), R003 (Dip Coating Number 3), R004 (Dip Coating Number 4), R005 (Dip Coating Number 5), R006 (Dip Coating Number 6), R008 (Rotary Coater Number 1), R009 (Rotary Coater Number 2), R010 (Automatic Coater Number 1), R011 (Automated Coater number 2), R012 (Automated Nut Coater) and R013 (Dip Coating associated with Tumbling) including any de minimus air contaminant sources as defined in OAC rule 3745-15-05 and any permanent exemption air contaminant sources installed subsequent to the issuance of this permit 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 volatile organic compound (VOC) content, as applied, for each coating employed in this emissions unit shall not exceed 9.0 pounds of VOC per gallon of coating. The VOC content of each cleanup material shall not exceed 7.75 pounds of VOC per gallon. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the VOC content limitations, usage limitations, and the emission limitations. The pounds per hour VOC emission limitation is based on the potential to emit of the emissions unit when coating miscellaneous metal parts. Therefore no hourly recordkeeping is required to determine compliance with this emission limitation. The emissions of Volatile Organic Compound (VOC) from emissions units R001 (Dip Coating Number 1), R002 (Dip Coating Number 2), R003 (Dip Coating Number 3), R004 (Dip Coating Number 4), R005 (Dip Coating Number 5), R006 (Dip Coating Number 6), R008 (Rotary Coater Number 1), R009 (Rotary Coater Number 2), R010 (Automatic Coater Number 1), R011 (Automated Coater number 2), R012 (Automated Nut Coater) and R013 (Dip Coating associated with Tumbling) combined shall not exceed 51.30 tons. Compliance with the above limitation shall be based on a rolling, 12 month-summation.

B. Operational Restrictions

- 1. The maximum annual coating usage for emissions units R001-R006 and R008-R013 combined shall not exceed 5200 gallons after subtracting out the amount of waste recovered. Compliance with the above limitation shall be based on a rolling, 12-month summation.
- 2. The maximum annual cleanup material usage for emissions units R001-R006 and R008-R013 combined shall not exceed 7200 gallons after subtracting out the amount of waste recovered. Compliance with the above limitation shall be based on a rolling, 12-month summation.
- 3. The maximum daily coating usage for this emissions unit shall not exceed 3 gallons, as applied, when coating miscellaneous metal parts.
- 4. On any day during which a non-metal part is coated in this emission unit using photochemically reactive material as defined in OAC rule 3745-21-01(C)(5), organic compound emissions shall not exceed forty pounds in any one day and eight pounds in any one hour.

C. Monitoring and/or Record Keeping Requirements

- 1. On any day during which a non-metal part is coated in this emissions unit using photochemically reactive material as defined in OAC rule 3745-21-01(C)(5) the permittee shall collect and record the following information:
 - a. The name and identification number of each coating employed.
 - b. The volume, in gallons, of each coating employed.
 - c. The total volume, in gallons, of all coatings employed.
 - d. The Organic Compound (OC) content of each coating, in pounds per gallon, as applied.

- e. The total OC emissions from coatings in pounds (b x d).
 - f. The name and identification number of each cleanup material employed.
 - g. The volume, in gallons, of each cleanup material employed.
 - h. The OC content of each cleanup material employed.
 - i. The total OC emissions from cleanup materials employed in pounds (g x h).
 - j. The total OC emissions from coatings and cleanup materials employed (e + i).
 - k. The hours of operation of the emissions unit.
 - l. The hourly OC emission rate for all coating and cleanup materials (j divided by k).
2. The permittee shall collect and record the following information each day for this emissions unit when coating miscellaneous metal parts:
- a. The name and identification number of each coating employed.
 - b. The volume, in gallons, of each coating employed, as applied.
3. This permittee shall collect and record the following information each month for the emissions units identified in term A.2.f:
- a. The name and identification number of each coating employed.
 - b. The volume, in gallons, of each coating employed.
 - c. The total volume, in gallons, of all coatings employed.
 - d. The VOC content of each coating, in pounds per gallon, as applied.
 - e. The total VOC emissions from coatings in pounds per month (b x d).
 - f. The name and identification number of each cleanup material employed.
 - g. The volume, in gallons, of each cleanup material employed.
 - h. The VOC content of each cleanup material employed.
 - i. The total VOC emissions from cleanup materials employed in pounds per month (g x h).
 - j. The total VOC emissions from coatings and cleanup materials employed per month (e + i).
 - k. The updated rolling twelve month total combined coatings and cleanup materials employed, in gallons.
 - l. The updated rolling twelve month total combined VOC emissions from all coatings and cleanup materials employed, in pounds or tons.
4. The permittee shall collect and record the following information each month for the emissions units identified in term and condition A.2.a:
- a. The name and identification number of each coating used.
 - 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 organic cleanup material employed.
 - f. The individual HAP content for each HAP of each organic cleanup material in pounds of individual HAP per gallon of organic cleanup material, as applied.
 - g. The total combined HAP content of each organic cleanup material in pounds of combined HAPs per gallon of organic cleanup material, as applied [sum all the individual HAP contents from (f)].
 - h. The number of gallons of each organic cleanup material employed.
 - i. The total individual HAP emissions for each HAP from all coatings and organic 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 organic cleanup material].
 - j. The total combined HAP emissions from all coatings and organic 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 organic cleanup material].
 - k. The updated rolling twelve month total of the total individual HAP emissions for each HAP from all coating and cleanup material employed, in pounds or tons.
 - l. The updated rolling twelve month total of the total combined HAPs from all coating and cleanup material employed, in pounds or tons.

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.

5. The permit to install for this emissions was evaluated based on the actual materials (typically coatings and cleanup 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: Toluene
 TLV (ug/m3): 188,405
 Maximum Hourly Emission Rate (lbs/hr): 3.42
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 399
 MAGLC (ug/m3): 4486
 Pollutant: Trichloroethylene
 TLV (ug/m3): 268,712
 Maximum Hourly Emission Rate (lbs/hr): 3.42
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 399
 MAGLC (ug/m3): 6398

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 (typically for coatings or cleanup materials), 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.

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 (i.e., VOC contents). 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.
2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing the use of more than three gallons of coatings 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.
3. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing an exceedance of eight pounds of OC emissions in any one hour or forty pounds in any one day when coating non-metal parts and using photochemically reactive material as defined in OAC rule 3745-21-01 (C)(5). 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.
4. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month VOC emission limitation set forth in term A.2.f or the coating or cleanup usage limitation in terms B.1 and B.2. 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.

5. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month HAP emission limitations set forth in term A.2.a. 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.

6. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit unless otherwise specified.

E. Testing Requirements

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

Emission Limitation:

Volatile Organic Compound (VOC) emissions shall not exceed 13.11 pounds per hour for coatings and cleanup material when coating miscellaneous metal parts.

Applicable Compliance Method:

The hourly VOC emission limitation was determined by multiplying the maximum VOC content, as applied, for coating and cleanup material identified in terms A.2.b and A.2.c by the maximum hourly application rates identified in Permit To Install application number 14-05826 and combining hourly coating and cleanup emissions. Record keeping is not required to determine compliance as the hourly emission limitation is based on the emissions unit's maximum potential usage.

For coatings- 9.0 pounds of VOC per gallon x 0.38 gallon of coating per hour.

For cleanup- 7.75 pounds of VOC per gallon x 1.25 gallons per hour.

Emission Limitation:

The emissions of VOC from emissions units R001 through R006 and R008 through R013, combined shall not exceed 51.30 tons per year based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month summation of VOC emission limitation shall be determined by adding the annual emissions from coating and cleanup usage. Annual VOC emissions from coating shall be determined by multiplying the VOC content of applied coatings by the rolling, 12-month summation of the usage. Annual VOC emissions from cleanup are determined by multiplying the VOC content of the cleanup by the rolling, 12-month summation of the usage. The annual emissions from the coating and cleanup are then summed and divided by 2000 lbs/ton to determine compliance with the annual emission limitation on a rolling, 12-month summation. Compliance shall be based upon the record keeping requirements as specified in term and condition C.3.

Emission Limitation:

The total allowable emissions of Hazardous Air Pollutants (HAPs) from the emissions units identified in term and condition A.2.a shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs.

Applicable Compliance Method:

Compliance with the HAP emission limitations shall be based on the recordkeeping requirements established in term C.4.

2. USEPA methods 24 and 24A shall be used to determine the VOC content for coatings and cleanup materials. If, pursuant to Method 24, 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 precision statements for Method 24 or 24A.

3. Operational Restriction:

The maximum annual coating usage for emissions units R001-R006 and R008-R013 combined shall not exceed 5200 gallons after subtracting out the amount of waste recovered. Compliance with the above limitation shall be based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the operational restriction in term B.1 shall be determined by the record keeping required in term C.3.

4. Operational Restriction:

The maximum annual cleanup material usage for emission units R001-R006 and R008-R013 combined shall not exceed 7200 gallons after subtracting out the amount of waste recovered. Compliance with the above limitation shall be based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the operational restriction in term B.2 shall be determined by the record keeping required in term C.3.

- 5. Operational Restriction:

The maximum daily coating usage for this emissions unit shall not exceed 3 gallons, as applied, when coating miscellaneous metal parts.

Applicable Compliance Method:

Compliance with the operational restriction in term B.3 shall be determined by the record keeping required in term C.2.

- 6. Operational Restriction:

On any day during which a non-metal part is coated in this emissions unit using photochemically reactive material as defined in OAC rule 3745-21-01(C)(5), organic compound emissions shall not exceed forty pounds in any one day nor eight pounds in any one hour.

Applicable Compliance Method:

Compliance with the operational restriction in term B.4 shall be determined by the record keeping required in term C.1.

F. Miscellaneous Requirements

- 1. The following terms of this permit to install shall be federally enforceable: A, B, C.1, through C.4, D, and E.

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

Facility ID: 1409000654 Emissions Unit ID: R003 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>
R003 - Dip Coating No. 3	OAC rule 3745-31-05(A)(3) (PTI 14-05826)	<p>Volatile Organic Compound (VOC) emissions shall not exceed 13.11 pounds per hour for coatings and cleanup material when coating miscellaneous metal parts.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2), OAC rule 3745-21-09(U)(2)(e)(ii) and OAC rule 3745-31-05(C).</p> <p>See terms A.2.b, A.2.c, B.1, and B.2.</p>
	OAC rule 3745-31-05(C) Synthetic Minor to avoid 40 CFR 63, Subpart Mmmm, Title V permitting and non-attainment new source review for VOC	See terms A.2.a and A.2.f.
	OAC rule 3745-21-09(U)(2)(e)(ii)	See term B.3.
	OAC 3745-21-07(G)(2)	See term B.4.

2. Additional Terms and Conditions

- (a) The emissions of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from emissions units R001 (Dip Coating Number 1), R002 (Dip Coating Number 2), R003 (Dip Coating Number 3), R004 (Dip Coating Number 4), R005 (Dip Coating Number 5), R006 (Dip Coating Number 6), R008 (Rotary Coater Number 1), R009 (Rotary Coater Number 2), R010 (Automatic Coater Number 1), R011 (Automated Coater number 2), R012 (Automated Nut Coater) and R013 (Dip Coating

associated with Tumbling) including any de minimus air contaminant sources as defined in OAC rule 3745-15-05 and any permanent exemption air contaminant sources installed subsequent to the issuance of this permit 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 volatile organic compound (VOC) content, as applied, for each coating employed in this emissions unit shall not exceed 9.0 pounds of VOC per gallon of coating.

The VOC content of each cleanup material shall not exceed 7.75 pounds of VOC per gallon.

Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the VOC content limitations, usage limitations, and the emission limitations.

The pounds per hour VOC emission limitation is based on the potential to emit of the emissions unit when coating miscellaneous metal parts. Therefore no hourly recordkeeping is required to determine compliance with this emission limitation.

The emissions of Volatile Organic Compound (VOC) from emissions units R001 (Dip Coating Number 1), R002 (Dip Coating Number 2), R003 (Dip Coating Number 3), R004 (Dip Coating Number 4), R005 (Dip Coating Number 5), R006 (Dip Coating Number 6), R008 (Rotary Coater Number 1), R009 (Rotary Coater Number 2), R010 (Automatic Coater Number 1), R011 (Automated Coater number 2), R012 (Automated Nut Coater) and R013 (Dip Coating associated with Tumbling) combined shall not exceed 51.30 tons. Compliance with the above limitation shall be based on a rolling, 12 month-summation.

B. Operational Restrictions

1. The maximum annual coating usage for emissions units R001-R006 and R008-R013 combined shall not exceed 5200 gallons after subtracting out the amount of waste recovered. Compliance with the above limitation shall be based on a rolling, 12-month summation.
2. The maximum annual cleanup material usage for emissions units R001-R006 and R008-R013 combined shall not exceed 7200 gallons after subtracting out the amount of waste recovered. Compliance with the above limitation shall be based on a rolling, 12-month summation.
3. The maximum daily coating usage for this emissions unit shall not exceed 3 gallons, as applied, when coating miscellaneous metal parts.
4. On any day during which a non-metal part is coated in this emission unit using photochemically reactive material as defined in OAC rule 3745-21-01(C)(5), organic compound emissions shall not exceed forty pounds in any one day and eight pounds in any one hour.

C. Monitoring and/or Record Keeping Requirements

1. On any day during which a non-metal part is coated in this emissions unit using photochemically reactive material as defined in OAC rule 3745-21-01(C)(5) the permittee shall collect and record the following information:
 - a. The name and identification number of each coating employed.
 - b. The volume, in gallons, of each coating employed.
 - c. The total volume, in gallons, of all coatings employed.
 - d. The Organic Compound (OC) content of each coating, in pounds per gallon, as applied.
 - e. The total OC emissions from coatings in pounds (b x d).
 - f. The name and identification number of each cleanup material employed.
 - g. The volume, in gallons, of each cleanup material employed.
 - h. The OC content of each cleanup material employed.
 - i. The total OC emissions from cleanup materials employed in pounds (g x h).
 - j. The total OC emissions from coatings and cleanup materials employed (e + i).
 - k. The hours of operation of the emissions unit.
 - l. The hourly OC emission rate for all coating and cleanup materials (j divided by k).
2. The permittee shall collect and record the following information each day for this emissions unit when coating miscellaneous metal parts:
 - a. The name and identification number of each coating employed.
 - b. The volume, in gallons, of each coating employed, as applied.
3. This permittee shall collect and record the following information each month for the emissions units identified in term A.2.f:
 - a. The name and identification number of each coating employed.
 - b. The volume, in gallons, of each coating employed.
 - c. The total volume, in gallons, of all coatings employed.
 - d. The VOC content of each coating, in pounds per gallon, as applied.
 - e. The total VOC emissions from coatings in pounds per month (b x d).
 - f. The name and identification number of each cleanup material employed.
 - g. The volume, in gallons, of each cleanup material employed.

- h. The VOC content of each cleanup material employed.
 - i. The total VOC emissions from cleanup materials employed in pounds per month (g x h).
 - j. The total VOC emissions from coatings and cleanup materials employed per month (e + i).
 - k. The updated rolling twelve month total combined coatings and cleanup materials employed, in gallons.
 - l. The updated rolling twelve month total combined VOC emissions from all coatings and cleanup materials employed, in pounds or tons.
4. The permittee shall collect and record the following information each month for the emissions units identified in term and condition A.2.a:
- a. The name and identification number of each coating used.
 - 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 organic cleanup material employed.
 - f. The individual HAP content for each HAP of each organic cleanup material in pounds of individual HAP per gallon of organic cleanup material, as applied.
 - g. The total combined HAP content of each organic cleanup material in pounds of combined HAPs per gallon of organic cleanup material, as applied [sum all the individual HAP contents from (f)].
 - h. The number of gallons of each organic cleanup material employed.
 - i. The total individual HAP emissions for each HAP from all coatings and organic 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 organic cleanup material].
 - j. The total combined HAP emissions from all coatings and organic 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 organic cleanup material].
 - k. The updated rolling twelve month total of the total individual HAP emissions for each HAP from all coating and cleanup material employed, in pounds or tons.
 - l. The updated rolling twelve month total of the total combined HAPs from all coating and cleanup material employed, in pounds or tons.

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.

5. The permit to install for this emissions was evaluated based on the actual materials (typically coatings and cleanup 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: Toluene
 TLV (ug/m3): 188,405
 Maximum Hourly Emission Rate (lbs/hr): 3.42
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 399
 MAGLC (ug/m3): 4486
 Pollutant: Trichloroethylene
 TLV (ug/m3): 268,712
 Maximum Hourly Emission Rate (lbs/hr): 3.42
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 399
 MAGLC (ug/m3): 6398

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 (typically for coatings or cleanup materials), 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.

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 (i.e., VOC contents). 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.

2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing the use of more than three gallons of coatings 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.

3. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing an exceedance of eight pounds of OC emissions in any one hour or forty pounds in any one day when coating non-metal parts and using photochemically reactive material as defined in OAC rule 3745-21-01 (C)(5). 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.

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

5. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month HAP emission limitations set forth in term A.2.a. 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.

6. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit unless otherwise specified.

E. Testing Requirements

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

Emission Limitation:

Volatile Organic Compound (VOC) emissions shall not exceed 13.11 pounds per hour for coatings and cleanup material when coating miscellaneous metal parts.

Applicable Compliance Method:

The hourly VOC emission limitation was determined by multiplying the maximum VOC content, as applied, for coating and cleanup material identified in terms A.2.b and A.2.c by the maximum hourly application rates identified in Permit To Install application number 14-05826 and combining hourly coating and cleanup emissions. Record keeping is not required to determine compliance as the hourly emission limitation is based on the emissions unit's maximum potential usage.

For coatings- 9.0 pounds of VOC per gallon x 0.38 gallon of coating per hour.

For cleanup- 7.75 pounds of VOC per gallon x 1.25 gallons per hour.

Emission Limitation:

The emissions of VOC from emissions units R001 through R006 and R008 through R013, combined shall not exceed 51.30 tons per year based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month summation of VOC emission limitation shall be determined by adding the annual emissions from coating and cleanup usage. Annual VOC emissions from coating shall be determined by multiplying the VOC content of applied coatings by the rolling, 12-month summation of the usage. Annual VOC emissions from cleanup are determined by multiplying the VOC content of the cleanup by the rolling, 12-month summation of the usage. The annual emissions from the coating and cleanup are then summed and divided by 2000 lbs/ton to determine compliance with the annual emission limitation on a rolling, 12-month summation. Compliance shall be based upon the record keeping requirements as specified in term and condition C.3.

Emission Limitation:

The total allowable emissions of Hazardous Air Pollutants (HAPs) from the emissions units identified in term and condition A.2.a shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs.

Applicable Compliance Method:

Compliance with the HAP emission limitations shall be based on the recordkeeping requirements established in term C.4.

2. USEPA methods 24 and 24A shall be used to determine the VOC content for coatings and cleanup materials. If, pursuant to Method 24, 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 precision statements for Method 24 or 24A.

3. Operational Restriction:

The maximum annual coating usage for emissions units R001-R006 and R008-R013 combined shall not exceed 5200 gallons after subtracting out the amount of waste recovered. Compliance with the above limitation shall be based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the operational restriction in term B.1 shall be determined by the record keeping required in term C.3.

4. Operational Restriction:

The maximum annual cleanup material usage for emission units R001-R006 and R008-R013 combined shall not exceed 7200 gallons after subtracting out the amount of waste recovered. Compliance with the above limitation shall be based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the operational restriction in term B.2 shall be determined by the record keeping required in term C.3.

5. Operational Restriction:

The maximum daily coating usage for this emissions unit shall not exceed 3 gallons, as applied, when coating miscellaneous metal parts.

Applicable Compliance Method:

Compliance with the operational restriction in term B.3 shall be determined by the record keeping required in term C.2.

6. Operational Restriction:

On any day during which a non-metal part is coated in this emissions unit using photochemically reactive material as defined in OAC rule 3745-21-01(C)(5), organic compound emissions shall not exceed forty pounds in any one day nor eight pounds in any one hour.

Applicable Compliance Method:

Compliance with the operational restriction in term B.4 shall be determined by the record keeping required in term C.1.

F. Miscellaneous Requirements

1. The following terms of this permit to install shall be federally enforceable: A, B, C.1, through C.4, D, and E.

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

Facility ID: 1409000654 Emissions Unit ID: R004 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>
R004 - Dip Coating No. 4	OAC rule 3745-31-05(A)(3) (PTI 14-05826)	<p>Volatile Organic Compound (VOC) emissions shall not exceed 13.11 pounds per hour for coatings and cleanup material when coating miscellaneous metal parts.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2), OAC rule 3745-21-09(U)(2)(e)(ii) and OAC rule 3745-31-05(C).</p> <p>See terms A.2.b, A.2.c, B.1, and B.2.</p>
	OAC rule 3745-31-05(C)	See terms A.2.a and A.2.f.
	Synthetic Minor to avoid 40 CFR 63, Subpart M, Title V permitting and non-attainment new source review for VOC	
	OAC rule 3745-21-09(U)(2)(e)(ii)	See term B.3.
	OAC 3745-21-07(G)(2)	See term B.4.

2. Additional Terms and Conditions

- (a) The emissions of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from emissions units R001 (Dip Coating Number 1), R002 (Dip Coating Number 2), R003 (Dip Coating Number 3), R004 (Dip Coating Number 4), R005 (Dip Coating Number 5), R006 (Dip Coating Number 6), R008 (Rotary Coater Number 1), R009 (Rotary Coater Number 2), R010 (Automatic Coater Number 1), R011 (Automated Coater number 2), R012 (Automated Nut Coater) and R013 (Dip Coating associated with Tumbling) including any de minimus air contaminant sources as defined in OAC rule 3745-15-05 and any permanent exemption air contaminant sources installed subsequent to the issuance of this permit 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 volatile organic compound (VOC) content, as applied, for each coating employed in this emissions unit shall not exceed 9.0 pounds of VOC per gallon of coating. The VOC content of each cleanup material shall not exceed 7.75 pounds of VOC per gallon. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the VOC content limitations, usage limitations, and the emission limitations. The pounds per hour VOC emission limitation is based on the potential to emit of the emissions unit when coating miscellaneous metal parts. Therefore no hourly recordkeeping is required to determine compliance with this emission limitation. The emissions of Volatile Organic Compound (VOC) from emissions units R001 (Dip Coating Number 1), R002 (Dip Coating Number 2), R003 (Dip Coating Number 3), R004 (Dip Coating Number 4), R005 (Dip Coating Number 5), R006 (Dip Coating Number 6), R008 (Rotary Coater Number 1), R009 (Rotary Coater Number 2), R010 (Automatic Coater Number 1), R011 (Automated Coater number 2), R012 (Automated Nut Coater) and R013 (Dip Coating associated with Tumbling) combined shall not exceed 51.30 tons. Compliance with the above limitation shall be based on a rolling, 12 month-summation.

B. Operational Restrictions

- 1. The maximum annual coating usage for emissions units R001-R006 and R008-R013 combined shall not exceed 5200 gallons after subtracting out the amount of waste recovered. Compliance with the above limitation shall be based on a rolling, 12-month summation.
- 2. The maximum annual cleanup material usage for emissions units R001-R006 and R008-R013 combined shall not exceed 7200 gallons after subtracting out the amount of waste recovered. Compliance with the above limitation shall be based on a rolling, 12-month summation.
- 3. The maximum daily coating usage for this emissions unit shall not exceed 3 gallons, as applied, when coating miscellaneous metal parts.
- 4. On any day during which a non-metal part is coated in this emission unit using photochemically reactive material as defined in OAC rule 3745-21-01(C)(5), organic compound emissions shall not exceed forty pounds in any one day and eight pounds in any one hour.

C. Monitoring and/or Record Keeping Requirements

- 1. On any day during which a non-metal part is coated in this emissions unit using photochemically reactive material as defined in OAC rule 3745-21-01(C)(5) the permittee shall collect and record the following information:
 - a. The name and identification number of each coating employed.

- b. The volume, in gallons, of each coating employed.
 - c. The total volume, in gallons, of all coatings employed.
 - d. The Organic Compound (OC) content of each coating, in pounds per gallon, as applied.
 - e. The total OC emissions from coatings in pounds (b x d).
 - f. The name and identification number of each cleanup material employed.
 - g. The volume, in gallons, of each cleanup material employed.
 - h. The OC content of each cleanup material employed.
 - i. The total OC emissions from cleanup materials employed in pounds (g x h).
 - j. The total OC emissions from coatings and cleanup materials employed (e + i).
 - k. The hours of operation of the emissions unit.
 - l. The hourly OC emission rate for all coating and cleanup materials (j divided by k).
2. The permittee shall collect and record the following information each day for this emissions unit when coating miscellaneous metal parts:
 - a. The name and identification number of each coating employed.
 - b. The volume, in gallons, of each coating employed, as applied.
3. This permittee shall collect and record the following information each month for the emissions units identified in term A.2.f:
 - a. The name and identification number of each coating employed.
 - b. The volume, in gallons, of each coating employed.
 - c. The total volume, in gallons, of all coatings employed.
 - d. The VOC content of each coating, in pounds per gallon, as applied.
 - e. The total VOC emissions from coatings in pounds per month (b x d).
 - f. The name and identification number of each cleanup material employed.
 - g. The volume, in gallons, of each cleanup material employed.
 - h. The VOC content of each cleanup material employed.
 - i. The total VOC emissions from cleanup materials employed in pounds per month (g x h).
 - j. The total VOC emissions from coatings and cleanup materials employed per month (e + i).
 - k. The updated rolling twelve month total combined coatings and cleanup materials employed, in gallons.
 - l. The updated rolling twelve month total combined VOC emissions from all coatings and cleanup materials employed, in pounds or tons.
4. The permittee shall collect and record the following information each month for the emissions units identified in term and condition A.2.a:
 - a. The name and identification number of each coating used.
 - 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 organic cleanup material employed.
 - f. The individual HAP content for each HAP of each organic cleanup material in pounds of individual HAP per gallon of organic cleanup material, as applied.
 - g. The total combined HAP content of each organic cleanup material in pounds of combined HAPs per gallon of organic cleanup material, as applied [sum all the individual HAP contents from (f)].
 - h. The number of gallons of each organic cleanup material employed.
 - i. The total individual HAP emissions for each HAP from all coatings and organic 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 organic cleanup material].
 - j. The total combined HAP emissions from all coatings and organic 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 organic cleanup material].

- k. The updated rolling twelve month total of the total individual HAP emissions for each HAP from all coating and cleanup material employed, in pounds or tons.

l. The updated rolling twelve month total of the total combined HAPs from all coating and cleanup material employed, in pounds or tons.

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.

5. The permit to install for this emissions was evaluated based on the actual materials (typically coatings and cleanup 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: Toluene
 TLV (ug/m3): 188,405
 Maximum Hourly Emission Rate (lbs/hr): 3.42
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 399
 MAGLC (ug/m3): 4486
 Pollutant: Trichloroethylene
 TLV (ug/m3): 268,712
 Maximum Hourly Emission Rate (lbs/hr): 3.42
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 399
 MAGLC (ug/m3): 6398

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 (typically for coatings or cleanup materials), 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.

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 (i.e., VOC contents). 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.
2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing the use of more than three gallons of coatings 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.
3. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing an exceedance of eight pounds of OC emissions in any one hour or forty pounds in any one day when coating non-metal parts and using photochemically reactive material as defined in OAC rule 3745-21-01 (C)(5). 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.
4. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month VOC emission limitation set forth in term A.2.f or the coating or cleanup usage limitation in

terms B.1 and B.2. 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.

5. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month HAP emission limitations set forth in term A.2.a. 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.

6. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit unless otherwise specified.

E. Testing Requirements

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

Emission Limitation:

Volatile Organic Compound (VOC) emissions shall not exceed 13.11 pounds per hour for coatings and cleanup material when coating miscellaneous metal parts.

Applicable Compliance Method:

The hourly VOC emission limitation was determined by multiplying the maximum VOC content, as applied, for coating and cleanup material identified in terms A.2.b and A.2.c by the maximum hourly application rates identified in Permit To Install application number 14-05826 and combining hourly coating and cleanup emissions. Record keeping is not required to determine compliance as the hourly emission limitation is based on the emissions unit's maximum potential usage.

For coatings- 9.0 pounds of VOC per gallon x 0.38 gallon of coating per hour.

For cleanup- 7.75 pounds of VOC per gallon x 1.25 gallons per hour.

Emission Limitation:

The emissions of VOC from emissions units R001 through R006 and R008 through R013, combined shall not exceed 51.30 tons per year based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month summation of VOC emission limitation shall be determined by adding the annual emissions from coating and cleanup usage. Annual VOC emissions from coating shall be determined by multiplying the VOC content of applied coatings by the rolling, 12-month summation of the usage. Annual VOC emissions from cleanup are determined by multiplying the VOC content of the cleanup by the rolling, 12-month summation of the usage. The annual emissions from the coating and cleanup are then summed and divided by 2000 lbs/ton to determine compliance with the annual emission limitation on a rolling, 12-month summation. Compliance shall be based upon the record keeping requirements as specified in term and condition C.3.

Emission Limitation:

The total allowable emissions of Hazardous Air Pollutants (HAPs) from the emissions units identified in term and condition A.2.a shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs.

Applicable Compliance Method:

Compliance with the HAP emission limitations shall be based on the recordkeeping requirements established in term C.4.

2. USEPA methods 24 and 24A shall be used to determine the VOC content for coatings and cleanup materials. If, pursuant to Method 24, 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 precision statements for Method 24 or 24A.

3. Operational Restriction:

The maximum annual coating usage for emissions units R001-R006 and R008-R013 combined shall not exceed 5200 gallons after subtracting out the amount of waste recovered. Compliance with the above limitation shall be based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the operational restriction in term B.1 shall be determined by the record keeping required in term C.3.

4. Operational Restriction:

The maximum annual cleanup material usage for emission units R001-R006 and R008-R013 combined shall not exceed 7200 gallons after subtracting out the amount of waste recovered. Compliance with the above limitation shall be based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the operational restriction in term B.2 shall be determined by the record keeping required in term C.3.

5. Operational Restriction:

The maximum daily coating usage for this emissions unit shall not exceed 3 gallons, as applied, when coating miscellaneous metal parts.

Applicable Compliance Method:

Compliance with the operational restriction in term B.3 shall be determined by the record keeping required in term C.2.

6. Operational Restriction:

On any day during which a non-metal part is coated in this emissions unit using photochemically reactive material as defined in OAC rule 3745-21-01(C)(5), organic compound emissions shall not exceed forty pounds in any one day nor eight pounds in any one hour.

Applicable Compliance Method:

Compliance with the operational restriction in term B.4 shall be determined by the record keeping required in term C.1.

F. **Miscellaneous Requirements**

1. The following terms of this permit to install shall be federally enforceable: A, B, C.1, through C.4, D, and E.

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

Facility ID: 1409000654 Emissions Unit ID: R005 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>
R005 - Dip Coating No. 5	OAC rule 3745-31-05(A)(3) (PTI 14-05826)	<p>Volatile Organic Compound (VOC) emissions shall not exceed 13.11 pounds per hour for coatings and cleanup material when coating miscellaneous metal parts.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2), OAC rule 3745-21-09(U)(2)(e)(ii) and OAC rule 3745-31-05(C).</p> <p>See terms A.2.b, A.2.c, B.1, and B.2.</p>
	OAC rule 3745-31-05(C)	See terms A.2.a and A.2.f.
	Synthetic Minor to avoid 40 CFR 63, Subpart M, Title V permitting and non-attainment new source review for VOC	
	OAC rule 3745-21-09(U)(2)(e)(ii)	See term B.3.
	OAC 3745-21-07(G)(2)	See term B.4.

2. **Additional Terms and Conditions**

- (a) The emissions of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from emissions units R001 (Dip Coating Number 1), R002 (Dip Coating Number 2), R003 (Dip Coating Number 3), R004 (Dip Coating Number 4), R005 (Dip Coating Number 5), R006 (Dip Coating Number 6), R008 (Rotary Coater Number 1), R009 (Rotary Coater Number 2), R010 (Automatic Coater Number 1), R011 (Automated Coater number 2), R012 (Automated Nut Coater) and R013 (Dip Coating associated with Tumbling) including any de minimus air contaminant sources as defined in OAC rule 3745-15-05 and any permanent exemption air contaminant sources installed subsequent to the issuance of this permit 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 volatile organic compound (VOC) content, as applied, for each coating employed in this emissions unit shall not exceed 9.0 pounds of VOC per gallon of coating. The VOC content of each cleanup material shall not exceed 7.75 pounds of VOC per gallon. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the VOC content limitations, usage limitations, and the emission limitations. The pounds per hour VOC emission limitation is based on the potential to emit of the emissions unit when coating miscellaneous metal parts. Therefore no hourly recordkeeping is required to determine compliance with this emission limitation. The emissions of Volatile Organic Compound (VOC) from emissions units R001 (Dip Coating Number 1), R002 (Dip Coating Number 2), R003 (Dip Coating Number 3), R004 (Dip Coating Number 4), R005 (Dip Coating Number 5), R006 (Dip Coating Number 6), R008 (Rotary Coater Number 1), R009 (Rotary Coater Number 2), R010 (Automatic Coater Number 1), R011 (Automated Coater number 2), R012 (Automated Nut Coater) and R013 (Dip Coating associated with Tumbling) combined shall not exceed 51.30 tons. Compliance with the above limitation shall be based on a rolling, 12 month-summation.

B. Operational Restrictions

1. The maximum annual coating usage for emissions units R001-R006 and R008-R013 combined shall not exceed 5200 gallons after subtracting out the amount of waste recovered. Compliance with the above limitation shall be based on a rolling, 12-month summation.
2. The maximum annual cleanup material usage for emissions units R001-R006 and R008-R013 combined shall not exceed 7200 gallons after subtracting out the amount of waste recovered. Compliance with the above limitation shall be based on a rolling, 12-month summation.
3. The maximum daily coating usage for this emissions unit shall not exceed 3 gallons, as applied, when coating miscellaneous metal parts.
4. On any day during which a non-metal part is coated in this emission unit using photochemically reactive material as defined in OAC rule 3745-21-01(C)(5), organic compound emissions shall not exceed forty pounds in any one day and eight pounds in any one hour.

C. Monitoring and/or Record Keeping Requirements

1. On any day during which a non-metal part is coated in this emissions unit using photochemically reactive material as defined in OAC rule 3745-21-01(C)(5) the permittee shall collect and record the following information:
 - a. The name and identification number of each coating employed.
 - b. The volume, in gallons, of each coating employed.
 - c. The total volume, in gallons, of all coatings employed.
 - d. The Organic Compound (OC) content of each coating, in pounds per gallon, as applied.
 - e. The total OC emissions from coatings in pounds (b x d).
 - f. The name and identification number of each cleanup material employed.
 - g. The volume, in gallons, of each cleanup material employed.
 - h. The OC content of each cleanup material employed.
 - i. The total OC emissions from cleanup materials employed in pounds (g x h).
 - j. The total OC emissions from coatings and cleanup materials employed (e + i).
 - k. The hours of operation of the emissions unit.
 - l. The hourly OC emission rate for all coating and cleanup materials (j divided by k).
2. The permittee shall collect and record the following information each day for this emissions unit when coating miscellaneous metal parts:
 - a. The name and identification number of each coating employed.
 - b. The volume, in gallons, of each coating employed, as applied.
3. This permittee shall collect and record the following information each month for the emissions units identified in term A.2.f:
 - a. The name and identification number of each coating employed.
 - b. The volume, in gallons, of each coating employed.
 - c. The total volume, in gallons, of all coatings employed.
 - d. The VOC content of each coating, in pounds per gallon, as applied.

- e. The total VOC emissions from coatings in pounds per month (b x d).
- The name and identification number of each cleanup material employed.
 - The volume, in gallons, of each cleanup material employed.
 - The VOC content of each cleanup material employed.
 - The total VOC emissions from cleanup materials employed in pounds per month (g x h).
 - The total VOC emissions from coatings and cleanup materials employed per month (e + i).
 - The updated rolling twelve month total combined coatings and cleanup materials employed, in gallons.
 - The updated rolling twelve month total combined VOC emissions from all coatings and cleanup materials employed, in pounds or tons.
4. The permittee shall collect and record the following information each month for the emissions units identified in term and condition A.2.a:
- The name and identification number of each coating used.
 - The individual Hazardous Air Pollutant (HAP) content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied.
 - 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)].
 - The number of gallons of each coating employed.
 - The name and identification of each organic cleanup material employed.
 - The individual HAP content for each HAP of each organic cleanup material in pounds of individual HAP per gallon of organic cleanup material, as applied.
 - The total combined HAP content of each organic cleanup material in pounds of combined HAPs per gallon of organic cleanup material, as applied [sum all the individual HAP contents from (f)].
 - The number of gallons of each organic cleanup material employed.
 - The total individual HAP emissions for each HAP from all coatings and organic 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 organic cleanup material].
 - The total combined HAP emissions from all coatings and organic 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 organic cleanup material].
 - The updated rolling twelve month total of the total individual HAP emissions for each HAP from all coating and cleanup material employed, in pounds or tons.
 - The updated rolling twelve month total of the total combined HAPs from all coating and cleanup material employed, in pounds or tons.

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.

5. The permit to install for this emissions was evaluated based on the actual materials (typically coatings and cleanup 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: Toluene
 TLV (ug/m3): 188,405
 Maximum Hourly Emission Rate (lbs/hr): 3.42
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 399
 MAGLC (ug/m3): 4486
 Pollutant: Trichloroethylene
 TLV (ug/m3): 268,712
 Maximum Hourly Emission Rate (lbs/hr): 3.42
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 399
 MAGLC (ug/m3): 6398

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:

- changes in the composition of the materials used (typically for coatings or cleanup materials), 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.

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 (i.e., VOC contents). 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.

2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing the use of more than three gallons of coatings 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.

3. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing an exceedance of eight pounds of OC emissions in any one hour or forty pounds in any one day when coating non-metal parts and using photochemically reactive material as defined in OAC rule 3745-21-01 (C)(5). 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.

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

5. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month HAP emission limitations set forth in term A.2.a. 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.

6. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit unless otherwise specified.

E. Testing Requirements

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

Emission Limitation:

Volatile Organic Compound (VOC) emissions shall not exceed 13.11 pounds per hour for coatings and cleanup material when coating miscellaneous metal parts.

Applicable Compliance Method:

The hourly VOC emission limitation was determined by multiplying the maximum VOC content, as applied, for coating and cleanup material identified in terms A.2.b and A.2.c by the maximum hourly application rates identified in Permit To Install application number 14-05826 and combining hourly coating and cleanup emissions. Record keeping is not required to determine compliance as the hourly emission limitation is based on the emissions unit's maximum potential usage.

For coatings- 9.0 pounds of VOC per gallon x 0.38 gallon of coating per hour.

For cleanup- 7.75 pounds of VOC per gallon x 1.25 gallons per hour.

Emission Limitation:

The emissions of VOC from emissions units R001 through R006 and R008 through R013, combined shall not exceed 51.30 tons per year based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month summation of VOC emission limitation shall be determined by adding the annual emissions from coating and cleanup usage. Annual VOC emissions from coating shall be determined by multiplying the VOC content of applied coatings by the rolling, 12-month summation of the usage. Annual VOC emissions from cleanup are determined by multiplying the VOC content of the cleanup by the rolling, 12-month summation of the usage. The annual emissions from the coating and cleanup are then summed and divided by 2000 lbs/ton to determine compliance with the annual emission limitation on a rolling, 12-month summation. Compliance shall be based upon the record keeping requirements as specified in term and condition C.3.
Emission Limitation:

The total allowable emissions of Hazardous Air Pollutants (HAPs) from the emissions units identified in term and condition A.2.a shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs.

Applicable Compliance Method:

Compliance with the HAP emission limitations shall be based on the recordkeeping requirements established in term C.4.

2. USEPA methods 24 and 24A shall be used to determine the VOC content for coatings and cleanup materials. If, pursuant to Method 24, 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 precision statements for Method 24 or 24A.

3. Operational Restriction:

The maximum annual coating usage for emissions units R001-R006 and R008-R013 combined shall not exceed 5200 gallons after subtracting out the amount of waste recovered. Compliance with the above limitation shall be based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the operational restriction in term B.1 shall be determined by the record keeping required in term C.3.

4. Operational Restriction:

The maximum annual cleanup material usage for emission units R001-R006 and R008-R013 combined shall not exceed 7200 gallons after subtracting out the amount of waste recovered. Compliance with the above limitation shall be based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the operational restriction in term B.2 shall be determined by the record keeping required in term C.3.

5. Operational Restriction:

The maximum daily coating usage for this emissions unit shall not exceed 3 gallons, as applied, when coating miscellaneous metal parts.

Applicable Compliance Method:

Compliance with the operational restriction in term B.3 shall be determined by the record keeping required in term C.2.

6. Operational Restriction:

On any day during which a non-metal part is coated in this emissions unit using photochemically reactive material as defined in OAC rule 3745-21-01(C)(5), organic compound emissions shall not exceed forty pounds in any one day nor eight pounds in any one hour.

Applicable Compliance Method:

Compliance with the operational restriction in term B.4 shall be determined by the record keeping required in term C.1.

F. Miscellaneous Requirements

1. The following terms of this permit to install shall be federally enforceable: A, B, C.1, through C.4, D, and E.

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

Facility ID: 1409000654 Emissions Unit ID: R006 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>
R006 - Dip Coating No. 6	OAC rule 3745-31-05(A)(3) (PTI 14-05826)	<p>Volatile Organic Compound (VOC) emissions shall not exceed 13.11 pounds per hour for coatings and cleanup material when coating miscellaneous metal parts.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2), OAC rule 3745-21-09(U)(2)(e)(ii) and OAC rule 3745-31-05(C).</p> <p>See terms A.2.b, A.2.c, B.1, and B.2.</p>
	OAC rule 3745-31-05(C)	See terms A.2.a and A.2.f.
	Synthetic Minor to avoid 40 CFR 63, Subpart Mmmm, Title V permitting and non-attainment new source review for VOC	
	OAC rule 3745-21-09(U)(2)(e)(ii)	See term B.3.
	OAC 3745-21-07(G)(2)	See term B.4.

2. Additional Terms and Conditions

- (a) The emissions of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from emissions units R001 (Dip Coating Number 1), R002 (Dip Coating Number 2), R003 (Dip Coating Number 3), R004 (Dip Coating Number 4), R005 (Dip Coating Number 5), R006 (Dip Coating Number 6), R008 (Rotary Coater Number 1), R009 (Rotary Coater Number 2), R010 (Automatic Coater Number 1), R011 (Automated Coater number 2), R012 (Automated Nut Coater) and R013 (Dip Coating associated with Tumbling) including any de minimus air contaminant sources as defined in OAC rule 3745-15-05 and any permanent exemption air contaminant sources installed subsequent to the issuance of this permit 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 volatile organic compound (VOC) content, as applied, for each coating employed in this emissions unit shall not exceed 9.0 pounds of VOC per gallon of coating. The VOC content of each cleanup material shall not exceed 7.75 pounds of VOC per gallon. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the VOC content limitations, usage limitations, and the emission limitations. The pounds per hour VOC emission limitation is based on the potential to emit of the emissions unit when coating miscellaneous metal parts. Therefore no hourly recordkeeping is required to determine compliance with this emission limitation. The emissions of Volatile Organic Compound (VOC) from emissions units R001 (Dip Coating Number 1), R002 (Dip Coating Number 2), R003 (Dip Coating Number 3), R004 (Dip Coating Number 4), R005 (Dip Coating Number 5), R006 (Dip Coating Number 6), R008 (Rotary Coater Number 1), R009 (Rotary Coater Number 2), R010 (Automatic Coater Number 1), R011 (Automated Coater number 2), R012 (Automated Nut Coater) and R013 (Dip Coating associated with Tumbling) combined shall not exceed 51.30 tons. Compliance with the above limitation shall be based on a rolling, 12 month-summation.

B. Operational Restrictions

1. The maximum annual coating usage for emissions units R001-R006 and R008-R013 combined shall not exceed 5200 gallons after subtracting out the amount of waste recovered. Compliance with the above limitation shall be based on a rolling, 12-month summation.
2. The maximum annual cleanup material usage for emissions units R001-R006 and R008-R013 combined shall not exceed 7200 gallons after subtracting out the amount of waste recovered. Compliance with the above limitation shall be based on a rolling, 12-month summation.
3. The maximum daily coating usage for this emissions unit shall not exceed 3 gallons, as applied, when coating miscellaneous metal parts.
4. On any day during which a non-metal part is coated in this emission unit using photochemically reactive material as defined in OAC rule 3745-21-01(C)(5), organic compound emissions shall not exceed forty pounds in any one day and eight pounds in any one hour.

C. Monitoring and/or Record Keeping Requirements

1. On any day during which a non-metal part is coated in this emissions unit using photochemically reactive material as defined in OAC rule 3745-21-01(C)(5) the permittee shall collect and record the following information:
 - a. The name and identification number of each coating employed.
 - b. The volume, in gallons, of each coating employed.
 - c. The total volume, in gallons, of all coatings employed.
 - d. The Organic Compound (OC) content of each coating, in pounds per gallon, as applied.
 - e. The total OC emissions from coatings in pounds (b x d).
 - f. The name and identification number of each cleanup material employed.
 - g. The volume, in gallons, of each cleanup material employed.
 - h. The OC content of each cleanup material employed.
 - i. The total OC emissions from cleanup materials employed in pounds (g x h).
 - j. The total OC emissions from coatings and cleanup materials employed (e + i).
 - k. The hours of operation of the emissions unit.
 - l. The hourly OC emission rate for all coating and cleanup materials (j divided by k).
2. The permittee shall collect and record the following information each day for this emissions unit when coating miscellaneous metal parts:
 - a. The name and identification number of each coating employed.
 - b. The volume, in gallons, of each coating employed, as applied.
3. This permittee shall collect and record the following information each month for the emissions units identified in term A.2.f:
 - a. The name and identification number of each coating employed.
 - b. The volume, in gallons, of each coating employed.
 - c. The total volume, in gallons, of all coatings employed.
 - d. The VOC content of each coating, in pounds per gallon, as applied.
 - e. The total VOC emissions from coatings in pounds per month (b x d).
 - f. The name and identification number of each cleanup material employed.
 - g. The volume, in gallons, of each cleanup material employed.
 - h. The VOC content of each cleanup material employed.
 - i. The total VOC emissions from cleanup materials employed in pounds per month (g x h).
 - j. The total VOC emissions from coatings and cleanup materials employed per month (e + i).
 - k. The updated rolling twelve month total combined coatings and cleanup materials employed, in gallons.
 - l. The updated rolling twelve month total combined VOC emissions from all coatings and cleanup materials employed, in pounds or tons.
4. The permittee shall collect and record the following information each month for the emissions units identified in term and condition A.2.a:
 - a. The name and identification number of each coating used.
 - 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 organic cleanup material employed.
 - f. The individual HAP content for each HAP of each organic cleanup material in pounds of individual HAP per gallon of organic cleanup material, as applied.
 - g. The total combined HAP content of each organic cleanup material in pounds of combined HAPs per gallon of organic cleanup material, as applied [sum all the individual HAP contents from (f)].
 - h. The number of gallons of each organic cleanup material employed.
 - i. The total individual HAP emissions for each HAP from all coatings and organic 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 organic cleanup material].

j. The total combined HAP emissions from all coatings and organic 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 organic cleanup material].

k. The updated rolling twelve month total of the total individual HAP emissions for each HAP from all coating and cleanup material employed, in pounds or tons.

l. The updated rolling twelve month total of the total combined HAPs from all coating and cleanup material employed, in pounds or tons.

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.

5. The permit to install for this emissions was evaluated based on the actual materials (typically coatings and cleanup 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: Toluene
 TLV (ug/m3): 188,405
 Maximum Hourly Emission Rate (lbs/hr): 3.42
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 399
 MAGLC (ug/m3): 4486
 Pollutant: Trichloroethylene
 TLV (ug/m3): 268,712
 Maximum Hourly Emission Rate (lbs/hr): 3.42
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 399
 MAGLC (ug/m3): 6398

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 (typically for coatings or cleanup materials), 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.

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 (i.e., VOC contents). 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.
2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing the use of more than three gallons of coatings 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.
3. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing an exceedance of eight pounds of OC emissions in any one hour or forty pounds in any one day when coating non-metal parts and using photochemically reactive material as defined in OAC rule 3745-21-01

(C)(5). 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.

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

5. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month HAP emission limitations set forth in term A.2.a. 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.

6. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit unless otherwise specified.

E. Testing Requirements

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

Emission Limitation:

Volatile Organic Compound (VOC) emissions shall not exceed 13.11 pounds per hour for coatings and cleanup material when coating miscellaneous metal parts.

Applicable Compliance Method:

The hourly VOC emission limitation was determined by multiplying the maximum VOC content, as applied, for coating and cleanup material identified in terms A.2.b and A.2.c by the maximum hourly application rates identified in Permit To Install application number 14-05826 and combining hourly coating and cleanup emissions. Record keeping is not required to determine compliance as the hourly emission limitation is based on the emissions unit's maximum potential usage.

For coatings- 9.0 pounds of VOC per gallon x 0.38 gallon of coating per hour.

For cleanup- 7.75 pounds of VOC per gallon x 1.25 gallons per hour.

Emission Limitation:

The emissions of VOC from emissions units R001 through R006 and R008 through R013, combined shall not exceed 51.30 tons per year based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month summation of VOC emission limitation shall be determined by adding the annual emissions from coating and cleanup usage. Annual VOC emissions from coating shall be determined by multiplying the VOC content of applied coatings by the rolling, 12-month summation of the usage. Annual VOC emissions from cleanup are determined by multiplying the VOC content of the cleanup by the rolling, 12-month summation of the usage. The annual emissions from the coating and cleanup are then summed and divided by 2000 lbs/ton to determine compliance with the annual emission limitation on a rolling, 12-month summation. Compliance shall be based upon the record keeping requirements as specified in term and condition C.3.

Emission Limitation:

The total allowable emissions of Hazardous Air Pollutants (HAPs) from the emissions units identified in term and condition A.2.a shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs.

Applicable Compliance Method:

Compliance with the HAP emission limitations shall be based on the recordkeeping requirements established in term C.4.

2. USEPA methods 24 and 24A shall be used to determine the VOC content for coatings and cleanup materials. If, pursuant to Method 24, 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 precision statements for Method 24 or 24A.

3. Operational Restriction:

The maximum annual coating usage for emissions units R001-R006 and R008-R013 combined shall not exceed 5200 gallons after subtracting out the amount of waste recovered. Compliance with the above limitation shall be based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the operational restriction in term B.1 shall be determined by the record keeping required in term C.3.

4. Operational Restriction:

The maximum annual cleanup material usage for emission units R001-R006 and R008-R013 combined shall not exceed 7200 gallons after subtracting out the amount of waste recovered. Compliance with the above limitation shall be based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the operational restriction in term B.2 shall be determined by the record keeping required in term C.3.

5. Operational Restriction:

The maximum daily coating usage for this emissions unit shall not exceed 3 gallons, as applied, when coating miscellaneous metal parts.

Applicable Compliance Method:

Compliance with the operational restriction in term B.3 shall be determined by the record keeping required in term C.2.

6. Operational Restriction:

On any day during which a non-metal part is coated in this emissions unit using photochemically reactive material as defined in OAC rule 3745-21-01(C)(5), organic compound emissions shall not exceed forty pounds in any one day nor eight pounds in any one hour.

Applicable Compliance Method:

Compliance with the operational restriction in term B.4 shall be determined by the record keeping required in term C.1.

F. **Miscellaneous Requirements**

1. The following terms of this permit to install shall be federally enforceable: A, B, C.1, through C.4, D, and E.

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

Facility ID: 1409000654 Emissions Unit ID: R008 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>
R008 - Dip Coating No. 8	OAC rule 3745-31-05(A)(3) (PTI 14-05826)	<p>Volatile Organic Compound (VOC) emissions shall not exceed 3.65 pounds per hour for coatings and cleanup material when coating miscellaneous metal parts.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2), OAC rule 3745-21-09(U)(2)(e)(ii) and OAC rule 3745-31-05(C).</p> <p>See terms A.2.b, A.2.c, B.1, and B.2.</p>
	OAC rule 3745-31-05(C) Synthetic Minor to avoid 40 CFR 63, Subpart M, Title V permitting and non-attainment new source review for VOC	See terms A.2.a and A.2.f.

OAC rule 3745-21-09(U)(2)(e)(ii) See term B.3.

2. Additional Terms and Conditions

- (a) The emissions of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from emissions units R001 (Dip Coating Number 1), R002 (Dip Coating Number 2), R003 (Dip Coating Number 3), R004 (Dip Coating Number 4), R005 (Dip Coating Number 5), R006 (Dip Coating Number 6), R008 (Rotary Coater Number 1), R009 (Rotary Coater Number 2), R010 (Automatic Coater Number 1), R011 (Automated Coater number 2), R012 (Automated Nut Coater) and R013 (Dip Coating associated with Tumbling) including any de minimus air contaminant sources as defined in OAC rule 3745-15-05 and any permanent exemption air contaminant sources installed subsequent to the issuance of this permit 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 volatile organic compound (VOC) content, as applied, for each coating employed in this emissions unit shall not exceed 9.0 pounds of VOC per gallon of coating. The VOC content of each cleanup material shall not exceed 7.75 pounds of VOC per gallon. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the VOC content limitations, usage limitations, and the emission limitations. The pounds per hour VOC emission limitation is based on the potential to emit of the emissions unit when coating miscellaneous metal parts. Therefore no hourly recordkeeping is required to determine compliance with this emission limitation. The emissions of Volatile Organic Compound (VOC) from emissions units R001 (Dip Coating Number 1), R002 (Dip Coating Number 2), R003 (Dip Coating Number 3), R004 (Dip Coating Number 4), R005 (Dip Coating Number 5), R006 (Dip Coating Number 6), R008 (Rotary Coater Number 1), R009 (Rotary Coater Number 2), R010 (Automatic Coater Number 1), R011 (Automated Coater number 2), R012 (Automated Nut Coater) and R013 (Dip Coating associated with Tumbling) combined shall not exceed 51.30 tons. Compliance with the above limitation shall be based on a rolling, 12 month-summation.

B. Operational Restrictions

1. The maximum annual coating usage for emissions units R001-R006 and R008-R013 combined shall not exceed 5200 gallons after subtracting out the amount of waste recovered. Compliance with the above limitation shall be based on a rolling, 12-month summation.
2. The maximum annual cleanup material usage for emissions units R001-R006 and R008-R013 combined shall not exceed 7200 gallons after subtracting out the amount of waste recovered. Compliance with the above limitation shall be based on a rolling, 12-month summation.
3. The maximum daily coating usage for this emissions unit shall not exceed 3 gallons, as applied, when coating miscellaneous metal parts.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit when coating miscellaneous metal parts:
 - a. The name and identification number of each coating employed.
 - b. The volume, in gallons, of each coating employed, as applied.
2. This permittee shall collect and record the following information each month for the emissions units identified in term A.2.f:
 - a. The name and identification number of each coating employed.
 - b. The volume, in gallons, of each coating employed.
 - c. The total volume, in gallons, of all coatings employed.
 - d. The VOC content of each coating, in pounds per gallon, as applied.
 - e. The total VOC emissions from coatings in pounds per month (b x d).
 - f. The name and identification number of each cleanup material employed.
 - g. The volume, in gallons, of each cleanup material employed.
 - h. The VOC content of each cleanup material employed.
 - i. The total VOC emissions from cleanup materials employed in pounds per month (g x h).
 - j. The total VOC emissions from coatings and cleanup materials employed per month (e + i).
 - k. The updated rolling twelve month total combined coatings and cleanup materials employed, in gallons.
 - l. The updated rolling twelve month total combined VOC emissions from all coatings and cleanup materials employed, in pounds or tons.
3. The permittee shall collect and record the following information each month for the emissions units identified in term and condition A.2.a:
 - a. The name and identification number of each coating used.
 - 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 organic cleanup material employed.
 - f. The individual HAP content for each HAP of each organic cleanup material in pounds of individual HAP per gallon of organic cleanup material, as applied.
 - g. The total combined HAP content of each organic cleanup material in pounds of combined HAPs per gallon of organic cleanup material, as applied [sum all the individual HAP contents from (f)].
 - h. The number of gallons of each organic cleanup material employed.
 - i. The total individual HAP emissions for each HAP from all coatings and organic 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 organic cleanup material].
 - j. The total combined HAP emissions from all coatings and organic 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 organic cleanup material].
 - k. The updated rolling twelve month total of the total individual HAP emissions for each HAP from all coating and cleanup material employed, in pounds or tons.
 - l. The updated rolling twelve month total of the total combined HAPs from all coating and cleanup material employed, in pounds or tons.
- 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.

- 4. The permit to install for this emissions was evaluated based on the actual materials (typically coatings and cleanup 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: Toluene
 TLV (ug/m3): 188,405
 Maximum Hourly Emission Rate (lbs/hr): 3.42
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 399
 MAGLC (ug/m3): 4486
 Pollutant: Trichloroethylene
 TLV (ug/m3): 268,712
 Maximum Hourly Emission Rate (lbs/hr): 3.42
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 399
 MAGLC (ug/m3): 6398

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 (typically for coatings or cleanup materials), 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.

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 (i.e., VOC contents). 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.
 2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing the use of more than three gallons of coatings 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.
 3. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month VOC emission limitation set forth in term A.2.f or the coating or cleanup usage limitation in terms B.1 and B.2. 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.
 4. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month HAP emission limitations set forth in term A.2.a. 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.
 5. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit unless otherwise specified.
- E. Testing Requirements**
1. Compliance with the emission limitations in Section A of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitation:

Volatile Organic Compound (VOC) emissions shall not exceed 3.65 pounds per hour for coatings and cleanup material when coating miscellaneous metal parts.

Applicable Compliance Method:

The hourly VOC emission limitation was determined by multiplying the maximum VOC content, as applied, for coating and cleanup material identified in terms A.2.b and A.2.c by the maximum hourly application rates identified in Permit To Install application number 14-05826 and combining hourly coating and cleanup emissions. Record keeping is not required to determine compliance as the hourly emission limitation is based on the emissions unit's maximum potential usage.

For coatings- 9.0 pounds of VOC per gallon x 0.38 gallon of coating per hour.

For cleanup- 7.75 pounds of VOC per gallon x 0.03 gallon per hour.

Emission Limitation:

The emissions of VOC from emissions units R001 through R006 and R008 through R013, combined shall not exceed 51.30 tons per year based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month summation of VOC emission limitation shall be determined by adding the annual emissions from coating and cleanup usage. Annual VOC emissions from coating shall be determined by multiplying the VOC content of applied coatings by the rolling, 12-month summation of the usage. Annual VOC emissions from cleanup are determined by multiplying the VOC content of the cleanup by the rolling, 12-month summation of the usage. The annual emissions from the coating and cleanup are then summed and divided by 2000 lbs/ton to determine compliance with the annual emission limitation on a rolling, 12-month summation. Compliance shall be based upon the record keeping requirements as specified in term and condition C.2.

Emission Limitation:

The total allowable emissions of Hazardous Air Pollutants (HAPs) from the emissions units identified in term and condition A.2.a shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs.

Applicable Compliance Method:

Compliance with the HAP emission limitations shall be based on the recordkeeping requirements established in term C.3.
 2. USEPA methods 24 and 24A shall be used to determine the VOC content for coatings and cleanup materials. If, pursuant to Method 24, 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 precision statements for Method 24 or 24A.
 3. Operational Restriction:

The maximum annual coating usage for emissions units R001-R006 and R008-R013 combined shall not exceed 5200 gallons after subtracting out the amount of waste recovered. Compliance with the above limitation shall be based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the operational restriction in term B.1 shall be determined by the record keeping required in term C.2.

4. Operational Restriction:

The maximum annual cleanup material usage for emission units R001-R006 and R008-R013 combined shall not exceed 7200 gallons after subtracting out the amount of waste recovered. Compliance with the above limitation shall be based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the operational restriction in term B.2 shall be determined by the record keeping required in term C.2.

5. Operational Restriction:

The maximum daily coating usage for this emissions unit shall not exceed 3 gallons, as applied, when coating miscellaneous metal parts.

Applicable Compliance Method:

Compliance with the operational restriction in term B.3 shall be determined by the record keeping required in term C.1.

F. **Miscellaneous Requirements**

1. The following terms of this permit to install shall be federally enforceable: A, B, C.1, through C.3, D, and E.

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

Facility ID: 1409000654 Emissions Unit ID: R009 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>
R009 - Dip Coating No.9	OAC rule 3745-31-05(A)(3) (PTI 14-05826)	<p>Volatile Organic Compound (VOC) emissions shall not exceed 3.65 pounds per hour for coatings and cleanup material when coating miscellaneous metal parts.</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> <p>See terms A.2.b, A.2.c, B.1, and B.2.</p>
	OAC rule 3745-31-05(C) Synthetic Minor to avoid 40 CFR 63, Subpart M, Title V permitting and non-attainment new source review for VOC	See terms A.2.a and A.2.f.
	OAC rule 3745-21-09(U)(2)(e)(ii)	See term B.3.

2. **Additional Terms and Conditions**

- (a) The emissions of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean

Air Act from emissions units R001 (Dip Coating Number 1), R002 (Dip Coating Number 2), R003 (Dip Coating Number 3), R004 (Dip Coating Number 4), R005 (Dip Coating Number 5), R006 (Dip Coating Number 6), R008 (Rotary Coater Number 1), R009 (Rotary Coater Number 2), R010 (Automatic Coater Number 1), R011 (Automated Coater number 2), R012 (Automated Nut Coater) and R013 (Dip Coating associated with Tumbling) including any de minimus air contaminant sources as defined in OAC rule 3745-15-05 and any permanent exemption air contaminant sources installed subsequent to the issuance of this permit 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 volatile organic compound (VOC) content, as applied, for each coating employed in this emissions unit shall not exceed 9.0 pounds of VOC per gallon of coating.

The VOC content of each cleanup material shall not exceed 7.75 pounds of VOC per gallon.

Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the VOC content limitations, usage limitations, and the emission limitations.

The pounds per hour VOC emission limitation is based on the potential to emit of the emissions unit when coating miscellaneous metal parts. Therefore no hourly recordkeeping is required to determine compliance with this emission limitation.

The emissions of Volatile Organic Compound (VOC) from emissions units R001 (Dip Coating Number 1), R002 (Dip Coating Number 2), R003 (Dip Coating Number 3), R004 (Dip Coating Number 4), R005 (Dip Coating Number 5), R006 (Dip Coating Number 6), R008 (Rotary Coater Number 1), R009 (Rotary Coater Number 2), R010 (Automatic Coater Number 1), R011 (Automated Coater number 2), R012 (Automated Nut Coater) and R013 (Dip Coating associated with Tumbling) combined shall not exceed 51.30 tons. Compliance with the above limitation shall be based on a rolling, 12 month-summation.

B. Operational Restrictions

1. The maximum annual coating usage for emissions units R001-R006 and R008-R013 combined shall not exceed 5200 gallons after subtracting out the amount of waste recovered. Compliance with the above limitation shall be based on a rolling, 12-month summation.
2. The maximum annual cleanup material usage for emissions units R001-R006 and R008-R013 combined shall not exceed 7200 gallons after subtracting out the amount of waste recovered. Compliance with the above limitation shall be based on a rolling, 12-month summation.
3. The maximum daily coating usage for this emissions unit shall not exceed 3 gallons, as applied, when coating miscellaneous metal parts.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit when coating miscellaneous metal parts:
 - a. The name and identification number of each coating employed.
 - b. The volume, in gallons, of each coating employed, as applied.
2. This permittee shall collect and record the following information each month for the emissions units identified in term A.2.f:
 - a. The name and identification number of each coating employed.
 - b. The volume, in gallons, of each coating employed.
 - c. The total volume, in gallons, of all coatings employed.
 - d. The VOC content of each coating, in pounds per gallon, as applied.
 - e. The total VOC emissions from coatings in pounds per month (b x d).
 - f. The name and identification number of each cleanup material employed.
 - g. The volume, in gallons, of each cleanup material employed.
 - h. The VOC content of each cleanup material employed.
 - i. The total VOC emissions from cleanup materials employed in pounds per month (g x h).
 - j. The total VOC emissions from coatings and cleanup materials employed per month (e + i).
 - k. The updated rolling twelve month total combined coatings and cleanup materials employed, in gallons.
 - l. The updated rolling twelve month total combined VOC emissions from all coatings and cleanup materials employed, in pounds or tons.
3. The permittee shall collect and record the following information each month for the emissions units identified in term and condition A.2.a:
 - a. The name and identification number of each coating used.
 - 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 organic cleanup material employed.
 - f. The individual HAP content for each HAP of each organic cleanup material in pounds of individual HAP per

gallon of organic cleanup material, as applied.

g. The total combined HAP content of each organic cleanup material in pounds of combined HAPs per gallon of organic cleanup material, as applied [sum all the individual HAP contents from (f)].
h. The number of gallons of each organic cleanup material employed.

i. The total individual HAP emissions for each HAP from all coatings and organic 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 organic cleanup material].

j. The total combined HAP emissions from all coatings and organic 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 organic cleanup material].

k. The updated rolling twelve month total of the total individual HAP emissions for each HAP from all coating and cleanup material employed, in pounds or tons.

l. The updated rolling twelve month total of the total combined HAPs from all coating and cleanup material employed, in pounds or tons.

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.

4. The permit to install for this emissions was evaluated based on the actual materials (typically coatings and cleanup 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: Toluene
TLV (ug/m3): 188,405
Maximum Hourly Emission Rate (lbs/hr): 3.42
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 399
MAGLC (ug/m3): 4486
Pollutant: Trichloroethylene
TLV (ug/m3): 268,712
Maximum Hourly Emission Rate (lbs/hr): 3.42
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 399
MAGLC (ug/m3): 6398

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 (typically for coatings or cleanup materials), 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.

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 (i.e., VOC contents). 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.

2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing the use of more than three gallons of coatings 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.
3. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month VOC emission limitation set forth in term A.2.f or the coating or cleanup usage limitation in terms B.1 and B.2. 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.
4. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month HAP emission limitations set forth in term A.2.a. 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.
5. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit unless otherwise specified.

E. Testing Requirements

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

Emission Limitation:

Volatile Organic Compound (VOC) emissions shall not exceed 3.65 pounds per hour for coatings and cleanup material when coating miscellaneous metal parts.

Applicable Compliance Method:

The hourly VOC emission limitation was determined by multiplying the maximum VOC content, as applied, for coating and cleanup material identified in terms A.2.b and A.2.c by the maximum hourly application rates identified in Permit To Install application number 14-05826 and combining hourly coating and cleanup emissions. Record keeping is not required to determine compliance as the hourly emission limitation is based on the emissions unit's maximum potential usage.

For coatings- 9.0 pounds of VOC per gallon x 0.38 gallon of coating per hour.

For cleanup- 7.75 pounds of VOC per gallon x 0.03 gallon per hour.

Emission Limitation:

The emissions of VOC from emissions units R001 through R006 and R008 through R013, combined shall not exceed 51.30 tons per year based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month summation of VOC emission limitation shall be determined by adding the annual emissions from coating and cleanup usage. Annual VOC emissions from coating shall be determined by multiplying the VOC content of applied coatings by the rolling, 12-month summation of the usage. Annual VOC emissions from cleanup are determined by multiplying the VOC content of the cleanup by the rolling, 12-month summation of the usage. The annual emissions from the coating and cleanup are then summed and divided by 2000 lbs/ton to determine compliance with the annual emission limitation on a rolling, 12-month summation. Compliance shall be based upon the record keeping requirements as specified in term and condition C.2.

Emission Limitation:

The total allowable emissions of Hazardous Air Pollutants (HAPs) from the emissions units identified in term and condition A.2.a shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs.

Applicable Compliance Method:

Compliance with the HAP emission limitations shall be based on the recordkeeping requirements established in term C.3.

2. USEPA methods 24 and 24A shall be used to determine the VOC content for coatings and cleanup materials. If, pursuant to Method 24, 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 precision statements for Method 24 or 24A.
3. Operational Restriction:

The maximum annual coating usage for emissions units R001-R006 and R008-R013 combined shall not exceed 5200 gallons after subtracting out the amount of waste recovered. Compliance with the above limitation shall be based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the operational restriction in term B.1 shall be determined by the record keeping required in

term C.2.

4. Operational Restriction:

The maximum annual cleanup material usage for emission units R001-R006 and R008-R013 combined shall not exceed 7200 gallons after subtracting out the amount of waste recovered. Compliance with the above limitation shall be based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the operational restriction in term B.2 shall be determined by the record keeping required in term C.2.

5. Operational Restriction:

The maximum daily coating usage for this emissions unit shall not exceed 3 gallons, as applied, when coating miscellaneous metal parts.

Applicable Compliance Method:

Compliance with the operational restriction in term B.3 shall be determined by the record keeping required in term C.1.

F. **Miscellaneous Requirements**

1. The following terms of this permit to install shall be federally enforceable: A, B, C.1, through C.3, D, and E.

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

Facility ID: 1409000654 Emissions Unit ID: R010 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>
R010 - Automatic MEC Machine No. 1	OAC rule 3745-31-05(A)(3) (PTI 14-05826)	Volatile Organic Compound (VOC) emissions shall not exceed 3.65 pounds per hour for coatings and cleanup material when coating miscellaneous metal parts. 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). See terms A.2.b, A.2.c, B.1, and B.2. See terms A.2.a and A.2.f.
	OAC rule 3745-31-05(C) Synthetic Minor to avoid 40 CFR 63, Subpart Mmmm, Title V permitting and non-attainment new source review for VOC	See terms A.2.a and A.2.f.
	OAC rule 3745-21-09(U)(2)(e)(ii)	See term B.3.

2. **Additional Terms and Conditions**

- (a) The emissions of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from emissions units R001 (Dip Coating Number 1), R002 (Dip Coating Number 2), R003 (Dip Coating Number 3), R004 (Dip Coating Number 4), R005 (Dip Coating Number 5), R006 (Dip Coating Number 6), R008 (Rotary Coater Number 1), R009 (Rotary Coater Number 2), R010 (Automatic Coater Number 1), R011 (Automated Coater number 2), R012 (Automated Nut Coater) and R013 (Dip Coating

associated with Tumbling) including any de minimus air contaminant sources as defined in OAC rule 3745-15-05 and any permanent exemption air contaminant sources installed subsequent to the issuance of this permit 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 volatile organic compound (VOC) content, as applied, for each coating employed in this emissions unit shall not exceed 9.0 pounds of VOC per gallon of coating.

The VOC content of each cleanup material shall not exceed 7.75 pounds of VOC per gallon.

Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the VOC content limitations, usage limitations, and the emission limitations.

The pounds per hour VOC emission limitation is based on the potential to emit of the emissions unit when coating miscellaneous metal parts. Therefore no hourly recordkeeping is required to determine compliance with this emission limitation.

The emissions of Volatile Organic Compound (VOC) from emissions units R001 (Dip Coating Number 1), R002 (Dip Coating Number 2), R003 (Dip Coating Number 3), R004 (Dip Coating Number 4), R005 (Dip Coating Number 5), R006 (Dip Coating Number 6), R008 (Rotary Coater Number 1), R009 (Rotary Coater Number 2), R010 (Automatic Coater Number 1), R011 (Automated Coater number 2), R012 (Automated Nut Coater) and R013 (Dip Coating associated with Tumbling) combined shall not exceed 51.30 tons. Compliance with the above limitation shall be based on a rolling, 12 month-summation.

B. Operational Restrictions

1. The maximum annual coating usage for emissions units R001-R006 and R008-R013 combined shall not exceed 5200 gallons after subtracting out the amount of waste recovered. Compliance with the above limitation shall be based on a rolling, 12-month summation.
2. The maximum annual cleanup material usage for emissions units R001-R006 and R008-R013 combined shall not exceed 7200 gallons after subtracting out the amount of waste recovered. Compliance with the above limitation shall be based on a rolling, 12-month summation.
3. The maximum daily coating usage for this emissions unit shall not exceed 3 gallons, as applied, when coating miscellaneous metal parts.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit when coating miscellaneous metal parts:
 - a. The name and identification number of each coating employed.
 - b. The volume, in gallons, of each coating employed, as applied.
2. This permittee shall collect and record the following information each month for the emissions units identified in term A.2.f:
 - a. The name and identification number of each coating employed.
 - b. The volume, in gallons, of each coating employed.
 - c. The total volume, in gallons, of all coatings employed.
 - d. The VOC content of each coating, in pounds per gallon, as applied.
 - e. The total VOC emissions from coatings in pounds per month (b x d).
 - f. The name and identification number of each cleanup material employed.
 - g. The volume, in gallons, of each cleanup material employed.
 - h. The VOC content of each cleanup material employed.
 - i. The total VOC emissions from cleanup materials employed in pounds per month (g x h).
 - j. The total VOC emissions from coatings and cleanup materials employed per month (e + i).
 - k. The updated rolling twelve month total combined coatings and cleanup materials employed, in gallons.
 - l. The updated rolling twelve month total combined VOC emissions from all coatings and cleanup materials employed, in pounds or tons.
3. The permittee shall collect and record the following information each month for the emissions units identified in term and condition A.2.a:
 - a. The name and identification number of each coating used.
 - 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 organic cleanup material employed.
 - f. The individual HAP content for each HAP of each organic cleanup material in pounds of individual HAP per gallon of organic cleanup material, as applied.
 - g. The total combined HAP content of each organic cleanup material in pounds of combined HAPs per gallon of organic cleanup material, as applied [sum all the individual HAP contents from (f)].

- h. The number of gallons of each organic cleanup material employed.
- i. The total individual HAP emissions for each HAP from all coatings and organic 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 organic cleanup material].
 - j. The total combined HAP emissions from all coatings and organic 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 organic cleanup material].
 - k. The updated rolling twelve month total of the total individual HAP emissions for each HAP from all coating and cleanup material employed, in pounds or tons.
 - l. The updated rolling twelve month total of the total combined HAPs from all coating and cleanup material employed, in pounds or tons.

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.

4. The permit to install for this emissions was evaluated based on the actual materials (typically coatings and cleanup 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: Toluene
 TLV (ug/m3): 188,405
 Maximum Hourly Emission Rate (lbs/hr): 3.42
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 399
 MAGLC (ug/m3): 4486
 Pollutant: Trichloroethylene
 TLV (ug/m3): 268,712
 Maximum Hourly Emission Rate (lbs/hr): 3.42
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 399
 MAGLC (ug/m3): 6398

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 (typically for coatings or cleanup materials), 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.

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 (i.e., VOC contents). 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.
2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing the use of more than three gallons of coatings 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.

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

4. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month HAP emission limitations set forth in term A.2.a. 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.

5. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit unless otherwise specified.

E. Testing Requirements

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

Emission Limitation:

Volatile Organic Compound (VOC) emissions shall not exceed 3.65 pounds per hour for coatings and cleanup material when coating miscellaneous metal parts.

Applicable Compliance Method:

The hourly VOC emission limitation was determined by multiplying the maximum VOC content, as applied, for coating and cleanup material identified in terms A.2.b and A.2.c by the maximum hourly application rates identified in Permit To Install application number 14-05826 and combining hourly coating and cleanup emissions. Record keeping is not required to determine compliance as the hourly emission limitation is based on the emissions unit's maximum potential usage.

For coatings- 9.0 pounds of VOC per gallon x 0.38 gallon of coating per hour.

For cleanup- 7.75 pounds of VOC per gallon x 0.03 gallon per hour.

Emission Limitation:

The emissions of VOC from emissions units R001 through R006 and R008 through R013, combined shall not exceed 51.30 tons per year based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month summation of VOC emission limitation shall be determined by adding the annual emissions from coating and cleanup usage. Annual VOC emissions from coating shall be determined by multiplying the VOC content of applied coatings by the rolling, 12-month summation of the usage. Annual VOC emissions from cleanup are determined by multiplying the VOC content of the cleanup by the rolling, 12-month summation of the usage. The annual emissions from the coating and cleanup are then summed and divided by 2000 lbs/ton to determine compliance with the annual emission limitation on a rolling, 12-month summation. Compliance shall be based upon the record keeping requirements as specified in term and condition C.2.

Emission Limitation:

The total allowable emissions of Hazardous Air Pollutants (HAPs) from the emissions units identified in term and condition A.2.a shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs.

Applicable Compliance Method:

Compliance with the HAP emission limitations shall be based on the recordkeeping requirements established in term C.3.

2. USEPA methods 24 and 24A shall be used to determine the VOC content for coatings and cleanup materials. If, pursuant to Method 24, 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 precision statements for Method 24 or 24A.

3. Operational Restriction:

The maximum annual coating usage for emissions units R001-R006 and R008-R013 combined shall not exceed 5200 gallons after subtracting out the amount of waste recovered. Compliance with the above limitation shall be based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the operational restriction in term B.1 shall be determined by the record keeping required in term C.2.

4. Operational Restriction:

The maximum annual cleanup material usage for emission units R001-R006 and R008-R013 combined shall not exceed 7200 gallons after subtracting out the amount of waste recovered. Compliance with the above limitation shall be based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the operational restriction in term B.2 shall be determined by the record keeping required in term C.2.

5. Operational Restriction:

The maximum daily coating usage for this emissions unit shall not exceed 3 gallons, as applied, when coating miscellaneous metal parts.

Applicable Compliance Method:

Compliance with the operational restriction in term B.3 shall be determined by the record keeping required in term C.1.

F. **Miscellaneous Requirements**

1. The following terms of this permit to install shall be federally enforceable: A, B, C.1, through C.3, D, and E.

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

Facility ID: 1409000654 Emissions Unit ID: R011 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>
R011 - Automotoc MEC Machine No.2	OAC rule 3745-31-05(A)(3) (PTI 14-05826)	<p>Volatile Organic Compound (VOC) emissions shall not exceed 3.65 pounds per hour for coatings and cleanup material when coating miscellaneous metal parts.</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> <p>See terms A.2.b, A.2.c, B.1, and B.2.</p>
	OAC rule 3745-31-05(C) Synthetic Minor to avoid 40 CFR 63, Subpart M, Title V permitting and non-attainment new source review for VOC	See terms A.2.a and A.2.f.
	OAC rule 3745-21-09(U)(2)(e)(ii)	See term B.3.

2. **Additional Terms and Conditions**

- (a) The emissions of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from emissions units R001 (Dip Coating Number 1), R002 (Dip Coating Number 2), R003 (Dip Coating Number 3), R004 (Dip Coating Number 4), R005 (Dip Coating Number 5), R006 (Dip Coating Number 6), R008 (Rotary Coater Number 1), R009 (Rotary Coater Number 2), R010 (Automatic Coater Number 1), R011 (Automated Coater number 2), R012 (Automated Nut Coater) and R013 (Dip Coating associated with Tumbling) including any de minimus air contaminant sources as defined in OAC rule 3745-15-05 and any permanent exemption air contaminant sources installed subsequent to the issuance of this permit 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 volatile organic compound (VOC) content, as applied, for each coating employed in this emissions unit shall not exceed 9.0 pounds of VOC per gallon of coating.

The VOC content of each cleanup material shall not exceed 7.75 pounds of VOC per gallon.

Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the VOC content limitations, usage limitations, and the emission limitations.

The pounds per hour VOC emission limitation is based on the potential to emit of the emissions unit when coating miscellaneous metal parts. Therefore no hourly recordkeeping is required to determine compliance with this emission limitation.

The emissions of Volatile Organic Compound (VOC) from emissions units R001 (Dip Coating Number 1), R002 (Dip Coating Number 2), R003 (Dip Coating Number 3), R004 (Dip Coating Number 4), R005 (Dip Coating Number 5), R006 (Dip Coating Number 6), R008 (Rotary Coater Number 1), R009 (Rotary Coater Number 2), R010 (Automatic Coater Number 1), R011 (Automated Coater number 2), R012 (Automated Nut Coater) and R013 (Dip Coating associated with Tumbling) combined shall not exceed 51.30 tons. Compliance with the above limitation shall be based on a rolling, 12 month-summation.

B. Operational Restrictions

1. The maximum annual coating usage for emissions units R001-R006 and R008-R013 combined shall not exceed 5200 gallons after subtracting out the amount of waste recovered. Compliance with the above limitation shall be based on a rolling, 12-month summation.
2. The maximum annual cleanup material usage for emissions units R001-R006 and R008-R013 combined shall not exceed 7200 gallons after subtracting out the amount of waste recovered. Compliance with the above limitation shall be based on a rolling, 12-month summation.
3. The maximum daily coating usage for this emissions unit shall not exceed 3 gallons, as applied, when coating miscellaneous metal parts.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit when coating miscellaneous metal parts:
 - a. The name and identification number of each coating employed.
 - b. The volume, in gallons, of each coating employed, as applied.
2. This permittee shall collect and record the following information each month for the emissions units identified in term A.2.f:
 - a. The name and identification number of each coating employed.
 - b. The volume, in gallons, of each coating employed.
 - c. The total volume, in gallons, of all coatings employed.
 - d. The VOC content of each coating, in pounds per gallon, as applied.
 - e. The total VOC emissions from coatings in pounds per month (b x d).
 - f. The name and identification number of each cleanup material employed.
 - g. The volume, in gallons, of each cleanup material employed.
 - h. The VOC content of each cleanup material employed.
 - i. The total VOC emissions from cleanup materials employed in pounds per month (g x h).
 - j. The total VOC emissions from coatings and cleanup materials employed per month (e + i).
 - k. The updated rolling twelve month total combined coatings and cleanup materials employed, in gallons.
 - l. The updated rolling twelve month total combined VOC emissions from all coatings and cleanup materials employed, in pounds or tons.
3. The permittee shall collect and record the following information each month for the emissions units identified in term and condition A.2.a:
 - a. The name and identification number of each coating used.
 - 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 organic cleanup material employed.
 - f. The individual HAP content for each HAP of each organic cleanup material in pounds of individual HAP per gallon of organic cleanup material, as applied.
 - g. The total combined HAP content of each organic cleanup material in pounds of combined HAPs per gallon of organic cleanup material, as applied [sum all the individual HAP contents from (f)].
 - h. The number of gallons of each organic cleanup material employed.
 - i. The total individual HAP emissions for each HAP from all coatings and organic 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 organic cleanup material].

- j. The total combined HAP emissions from all coatings and organic 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 organic cleanup material].
- k. The updated rolling twelve month total of the total individual HAP emissions for each HAP from all coating and cleanup material employed, in pounds or tons.
- l. The updated rolling twelve month total of the total combined HAPs from all coating and cleanup material employed, in pounds or tons.

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.

- 4. The permit to install for this emissions was evaluated based on the actual materials (typically coatings and cleanup 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: Toluene
 TLV (ug/m³): 188,405
 Maximum Hourly Emission Rate (lbs/hr): 3.42
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 399
 MAGLC (ug/m³): 4486
 Pollutant: Trichloroethylene
 TLV (ug/m³): 268,712
 Maximum Hourly Emission Rate (lbs/hr): 3.42
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 399
 MAGLC (ug/m³): 6398

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 (typically for coatings or cleanup materials), 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.

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 (i.e., VOC contents). 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.
- 2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing the use of more than three gallons of coatings 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.
- 3. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month VOC emission limitation set forth in term A.2.f or the coating or cleanup usage limitation in

terms B.1 and B.2. 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.

4. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month HAP emission limitations set forth in term A.2.a. 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.

5. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit unless otherwise specified.

E. Testing Requirements

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

Emission Limitation:

Volatile Organic Compound (VOC) emissions shall not exceed 3.65 pounds per hour for coatings and cleanup material when coating miscellaneous metal parts.

Applicable Compliance Method:

The hourly VOC emission limitation was determined by multiplying the maximum VOC content, as applied, for coating and cleanup material identified in terms A.2.b and A.2.c by the maximum hourly application rates identified in Permit To Install application number 14-05826 and combining hourly coating and cleanup emissions. Record keeping is not required to determine compliance as the hourly emission limitation is based on the emissions unit's maximum potential usage.

For coatings- 9.0 pounds of VOC per gallon x 0.38 gallon of coating per hour.

For cleanup- 7.75 pounds of VOC per gallon x 0.03 gallon per hour.

Emission Limitation:

The emissions of VOC from emissions units R001 through R006 and R008 through R013, combined shall not exceed 51.30 tons per year based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month summation of VOC emission limitation shall be determined by adding the annual emissions from coating and cleanup usage. Annual VOC emissions from coating shall be determined by multiplying the VOC content of applied coatings by the rolling, 12-month summation of the usage. Annual VOC emissions from cleanup are determined by multiplying the VOC content of the cleanup by the rolling, 12-month summation of the usage. The annual emissions from the coating and cleanup are then summed and divided by 2000 lbs/ton to determine compliance with the annual emission limitation on a rolling, 12-month summation. Compliance shall be based upon the record keeping requirements as specified in term and condition C.2.

Emission Limitation:

The total allowable emissions of Hazardous Air Pollutants (HAPs) from the emissions units identified in term and condition A.2.a shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs.

Applicable Compliance Method:

Compliance with the HAP emission limitations shall be based on the recordkeeping requirements established in term C.3.

2. USEPA methods 24 and 24A shall be used to determine the VOC content for coatings and cleanup materials. If, pursuant to Method 24, 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 precision statements for Method 24 or 24A.

3. Operational Restriction:

The maximum annual coating usage for emissions units R001-R006 and R008-R013 combined shall not exceed 5200 gallons after subtracting out the amount of waste recovered. Compliance with the above limitation shall be based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the operational restriction in term B.1 shall be determined by the record keeping required in term C.2.

4. Operational Restriction:

The maximum annual cleanup material usage for emission units R001-R006 and R008-R013 combined shall not exceed 7200 gallons after subtracting out the amount of waste recovered. Compliance with the above limitation shall be based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the operational restriction in term B.2 shall be determined by the record keeping required in term C.2.

5. Operational Restriction:

The maximum daily coating usage for this emissions unit shall not exceed 3 gallons, as applied, when coating miscellaneous metal parts.

Applicable Compliance Method:

Compliance with the operational restriction in term B.3 shall be determined by the record keeping required in term C.1.

F. Miscellaneous Requirements

1. The following terms of this permit to install shall be federally enforceable: A, B, C.1, through C.3, D, and E.

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

Facility ID: 1409000654 Emissions Unit ID: R012 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>
R012 - Automated Nut Coater	OAC rule 3745-31-05(A)(3) (PTI 14-05826)	Volatile Organic Compound (VOC) emissions shall not exceed 3.65 pounds per hour for coatings and cleanup material when coating miscellaneous metal parts. 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). See terms A.2.b, A.2.c, B.1, and B.2. See terms A.2.a and A.2.f.
	OAC rule 3745-31-05(C) Synthetic Minor to avoid 40 CFR 63, Subpart Mmmm, Title V permitting and non-attainment new source review for VOC	See terms A.2.a and A.2.f.
	OAC rule 3745-21-09(U)(2)(e)(ii)	See term B.3.

2. Additional Terms and Conditions

- (a) The emissions of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from emissions units R001 (Dip Coating Number 1), R002 (Dip Coating Number 2), R003 (Dip Coating Number 3), R004 (Dip Coating Number 4), R005 (Dip Coating Number 5), R006 (Dip Coating Number 6), R008 (Rotary Coater Number 1), R009 (Rotary Coater Number 2), R010 (Automatic Coater Number 1), R011 (Automated Coater number 2), R012 (Automated Nut Coater) and R013 (Dip Coating associated with Tumbling) including any de minimus air contaminant sources as defined in OAC rule 3745-15-05 and any permanent exemption air contaminant sources installed subsequent to the issuance of this permit 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 volatile organic compound (VOC) content, as applied, for each coating employed in this emissions unit shall not exceed 9.0 pounds of VOC per gallon of coating. The VOC content of each cleanup material shall not exceed 7.75 pounds of VOC per gallon. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the VOC content limitations,

usage limitations, and the emission limitations.

The pounds per hour VOC emission limitation is based on the potential to emit of the emissions unit when coating miscellaneous metal parts. Therefore no hourly recordkeeping is required to determine compliance with this emission limitation.

The emissions of Volatile Organic Compound (VOC) from emissions units R001 (Dip Coating Number 1), R002 (Dip Coating Number 2), R003 (Dip Coating Number 3), R004 (Dip Coating Number 4), R005 (Dip Coating Number 5), R006 (Dip Coating Number 6), R008 (Rotary Coater Number 1), R009 (Rotary Coater Number 2), R010 (Automatic Coater Number 1), R011 (Automated Coater number 2), R012 (Automated Nut Coater) and R013 (Dip Coating associated with Tumbling) combined shall not exceed 51.30 tons. Compliance with the above limitation shall be based on a rolling, 12 month-summation.

B. Operational Restrictions

1. The maximum annual coating usage for emissions units R001-R006 and R008-R013 combined shall not exceed 5200 gallons after subtracting out the amount of waste recovered. Compliance with the above limitation shall be based on a rolling, 12-month summation.
2. The maximum annual cleanup material usage for emissions units R001-R006 and R008-R013 combined shall not exceed 7200 gallons after subtracting out the amount of waste recovered. Compliance with the above limitation shall be based on a rolling, 12-month summation.
3. The maximum daily coating usage for this emissions unit shall not exceed 3 gallons, as applied, when coating miscellaneous metal parts.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit when coating miscellaneous metal parts:
 - a. The name and identification number of each coating employed.
 - b. The volume, in gallons, of each coating employed, as applied.
2. This permittee shall collect and record the following information each month for the emissions units identified in term A.2.f:
 - a. The name and identification number of each coating employed.
 - b. The volume, in gallons, of each coating employed.
 - c. The total volume, in gallons, of all coatings employed.
 - d. The VOC content of each coating, in pounds per gallon, as applied.
 - e. The total VOC emissions from coatings in pounds per month (b x d).
 - f. The name and identification number of each cleanup material employed.
 - g. The volume, in gallons, of each cleanup material employed.
 - h. The VOC content of each cleanup material employed.
 - i. The total VOC emissions from cleanup materials employed in pounds per month (g x h).
 - j. The total VOC emissions from coatings and cleanup materials employed per month (e + i).
 - k. The updated rolling twelve month total combined coatings and cleanup materials employed, in gallons.
 - l. The updated rolling twelve month total combined VOC emissions from all coatings and cleanup materials employed, in pounds or tons.
3. The permittee shall collect and record the following information each month for the emissions units identified in term and condition A.2.a:
 - a. The name and identification number of each coating used.
 - 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 organic cleanup material employed.
 - f. The individual HAP content for each HAP of each organic cleanup material in pounds of individual HAP per gallon of organic cleanup material, as applied.
 - g. The total combined HAP content of each organic cleanup material in pounds of combined HAPs per gallon of organic cleanup material, as applied [sum all the individual HAP contents from (f)].
 - h. The number of gallons of each organic cleanup material employed.
 - i. The total individual HAP emissions for each HAP from all coatings and organic 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 organic cleanup material].
 - j. The total combined HAP emissions from all coatings and organic 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 organic cleanup

material].

k. The updated rolling twelve month total of the total individual HAP emissions for each HAP from all coating and cleanup material employed, in pounds or tons.

l. The updated rolling twelve month total of the total combined HAPs from all coating and cleanup material employed, in pounds or tons.

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.

4. The permit to install for this emissions was evaluated based on the actual materials (typically coatings and cleanup 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: Toluene
 TLV (ug/m³): 188,405
 Maximum Hourly Emission Rate (lbs/hr): 3.42
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 399
 MAGLC (ug/m³): 4486
 Pollutant: Trichloroethylene
 TLV (ug/m³): 268,712
 Maximum Hourly Emission Rate (lbs/hr): 3.42
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 399
 MAGLC (ug/m³): 6398

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 (typically for coatings or cleanup materials), 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.

D. Reporting Requirements

- 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 (i.e., VOC contents). 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.
- The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing the use of more than three gallons of coatings 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.
- The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month VOC emission limitation set forth in term A.2.f or the coating or cleanup usage limitation in terms B.1 and B.2. 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.

4. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month HAP emission limitations set forth in term A.2.a. 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.

5. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit unless otherwise specified.

E. Testing Requirements

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

Emission Limitation:

Volatile Organic Compound (VOC) emissions shall not exceed 3.65 pounds per hour for coatings and cleanup material when coating miscellaneous metal parts.

Applicable Compliance Method:

The hourly VOC emission limitation was determined by multiplying the maximum VOC content, as applied, for coating and cleanup material identified in terms A.2.b and A.2.c by the maximum hourly application rates identified in Permit To Install application number 14-05826 and combining hourly coating and cleanup emissions. Record keeping is not required to determine compliance as the hourly emission limitation is based on the emissions unit's maximum potential usage.

For coatings- 9.0 pounds of VOC per gallon x 0.38 gallon of coating per hour.

For cleanup- 7.75 pounds of VOC per gallon x 0.03 gallon per hour.

Emission Limitation:

The emissions of VOC from emissions units R001 through R006 and R008 through R013, combined shall not exceed 51.30 tons per year based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month summation of VOC emission limitation shall be determined by adding the annual emissions from coating and cleanup usage. Annual VOC emissions from coating shall be determined by multiplying the VOC content of applied coatings by the rolling, 12-month summation of the usage. Annual VOC emissions from cleanup are determined by multiplying the VOC content of the cleanup by the rolling, 12-month summation of the usage. The annual emissions from the coating and cleanup are then summed and divided by 2000 lbs/ton to determine compliance with the annual emission limitation on a rolling, 12-month summation. Compliance shall be based upon the record keeping requirements as specified in term and condition C.2.

Emission Limitation:

The total allowable emissions of Hazardous Air Pollutants (HAPs) from the emissions units identified in term and condition A.2.a shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs.

Applicable Compliance Method:

Compliance with the HAP emission limitations shall be based on the recordkeeping requirements established in term C.3.

2. USEPA methods 24 and 24A shall be used to determine the VOC content for coatings and cleanup materials. If, pursuant to Method 24, 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 precision statements for Method 24 or 24A.

3. Operational Restriction:

The maximum annual coating usage for emissions units R001-R006 and R008-R013 combined shall not exceed 5200 gallons after subtracting out the amount of waste recovered. Compliance with the above limitation shall be based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the operational restriction in term B.1 shall be determined by the record keeping required in term C.2.

4. Operational Restriction:

The maximum annual cleanup material usage for emission units R001-R006 and R008-R013 combined shall not exceed 7200 gallons after subtracting out the amount of waste recovered. Compliance with the above limitation shall be based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the operational restriction in term B.2 shall be determined by the record keeping required in term C.2.

5. Operational Restriction:

The maximum daily coating usage for this emissions unit shall not exceed 3 gallons, as applied, when coating miscellaneous metal parts.

Applicable Compliance Method:

Compliance with the operational restriction in term B.3 shall be determined by the record keeping required in term C.1.

F. **Miscellaneous Requirements**

1. The following terms of this permit to install shall be federally enforceable: A, B, C.1, through C.3, D, and E.

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

Facility ID: 1409000654 Emissions Unit ID: R013 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>
R013 - Dip Coating Associated with Tumbling	OAC rule 3745-31-05(A)(3) (PTI 14-05826)	Volatile Organic Compound (VOC) emissions shall not exceed 5.59 pounds per hour for coatings and cleanup material when coating miscellaneous metal parts. 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). See terms A.2.b, A.2.c, B.1, and B.2. See terms A.2.a and A.2.f.
	OAC rule 3745-31-05(C)	See terms A.2.a and A.2.f.
	Synthetic Minor to avoid 40 CFR 63, Subpart M, Title V permitting and non-attainment new source review for VOC	
	OAC rule 3745-21-09(U)(2)(e)(ii)	See term B.3.

2. **Additional Terms and Conditions**

- (a) The emissions of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from emissions units R001 (Dip Coating Number 1), R002 (Dip Coating Number 2), R003 (Dip Coating Number 3), R004 (Dip Coating Number 4), R005 (Dip Coating Number 5), R006 (Dip Coating Number 6), R008 (Rotary Coater Number 1), R009 (Rotary Coater Number 2), R010 (Automatic Coater Number 1), R011 (Automated Coater number 2), R012 (Automated Nut Coater) and R013 (Dip Coating associated with Tumbling) including any de minimus air contaminant sources as defined in OAC rule 3745-15-05 and any permanent exemption air contaminant sources installed subsequent to the issuance of this permit 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 volatile organic compound (VOC) content, as applied, for each coating employed in this emissions unit shall not exceed 9.0 pounds of VOC per gallon of coating. The VOC content of each cleanup material shall not exceed 7.75 pounds of VOC per gallon. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the VOC content limitations, usage limitations, and the emission limitations. The pounds per hour VOC emission limitation is based on the potential to emit of the emissions unit when coating miscellaneous metal parts. Therefore no hourly recordkeeping is required to determine compliance with this emission limitation. The emissions of Volatile Organic Compound (VOC) from emissions units R001 (Dip Coating Number

- 1), R002 (Dip Coating Number 2), R003 (Dip Coating Number 3), R004 (Dip Coating Number 4), R005 (Dip Coating Number 5), R006 (Dip Coating Number 6), R008 (Rotary Coater Number 1), R009 (Rotary Coater Number 2), R010 (Automatic Coater Number 1), R011 (Automated Coater number 2), R012 (Automated Nut Coater) and R013 (Dip Coating associated with Tumbling) combined shall not exceed 51.30 tons. Compliance with the above limitation shall be based on a rolling, 12 month-summation.

B. Operational Restrictions

1. The maximum annual coating usage for emissions units R001-R006 and R008-R013 combined shall not exceed 5200 gallons after subtracting out the amount of waste recovered. Compliance with the above limitation shall be based on a rolling, 12-month summation.
2. The maximum annual cleanup material usage for emissions units R001-R006 and R008-R013 combined shall not exceed 7200 gallons after subtracting out the amount of waste recovered. Compliance with the above limitation shall be based on a rolling, 12-month summation.
3. The maximum daily coating usage for this emissions unit shall not exceed 3 gallons, as applied, when coating miscellaneous metal parts.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit when coating miscellaneous metal parts:
 - a. The name and identification number of each coating employed.
 - b. The volume, in gallons, of each coating employed, as applied.
2. This permittee shall collect and record the following information each month for the emissions units identified in term A.2.f:
 - a. The name and identification number of each coating employed.
 - b. The volume, in gallons, of each coating employed.
 - c. The total volume, in gallons, of all coatings employed.
 - d. The VOC content of each coating, in pounds per gallon, as applied.
 - e. The total VOC emissions from coatings in pounds per month (b x d).
 - f. The name and identification number of each cleanup material employed.
 - g. The volume, in gallons, of each cleanup material employed.
 - h. The VOC content of each cleanup material employed.
 - i. The total VOC emissions from cleanup materials employed in pounds per month (g x h).
 - j. The total VOC emissions from coatings and cleanup materials employed per month (e + i).
 - k. The updated rolling twelve month total combined coatings and cleanup materials employed, in gallons.
 - l. The updated rolling twelve month total combined VOC emissions from all coatings and cleanup materials employed, in pounds or tons.
3. The permittee shall collect and record the following information each month for the emissions units identified in term and condition A.2.a:
 - a. The name and identification number of each coating used.
 - 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 organic cleanup material employed.
 - f. The individual HAP content for each HAP of each organic cleanup material in pounds of individual HAP per gallon of organic cleanup material, as applied.
 - g. The total combined HAP content of each organic cleanup material in pounds of combined HAPs per gallon of organic cleanup material, as applied [sum all the individual HAP contents from (f)].
 - h. The number of gallons of each organic cleanup material employed.
 - i. The total individual HAP emissions for each HAP from all coatings and organic 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 organic cleanup material].
 - j. The total combined HAP emissions from all coatings and organic 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 organic cleanup material].
 - k. The updated rolling twelve month total of the total individual HAP emissions for each HAP from all coating and cleanup material employed, in pounds or tons.

- I. The updated rolling twelve month total of the total combined HAPs from all coating and cleanup material employed, in pounds or tons.

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.

4. The permit to install for this emissions was evaluated based on the actual materials (typically coatings and cleanup 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: Toluene
 TLV (ug/m3): 188,405
 Maximum Hourly Emission Rate (lbs/hr): 3.42
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 399
 MAGLC (ug/m3): 4486
 Pollutant: Trichloroethylene
 TLV (ug/m3): 268,712
 Maximum Hourly Emission Rate (lbs/hr): 3.42
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 399
 MAGLC (ug/m3): 6398

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 (typically for coatings or cleanup materials), 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.

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 (i.e., VOC contents). 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.
2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing the use of more than three gallons of coatings 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.
3. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month VOC emission limitation set forth in term A.2.f or the coating or cleanup usage limitation in terms B.1 and B.2. 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.

4. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month HAP emission limitations set forth in term A.2.a. 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.

5. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit unless otherwise specified.

E. Testing Requirements

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

Emission Limitation:

Volatile Organic Compound (VOC) emissions shall not exceed 5.59 pounds per hour for coatings and cleanup material when coating miscellaneous metal parts.

Applicable Compliance Method:

The hourly VOC emission limitation was determined by multiplying the maximum VOC content, as applied, for coating and cleanup material identified in terms A.2.b and A.2.c by the maximum hourly application rates identified in Permit To Install application number 14-05826 and combining hourly coating and cleanup emissions. Record keeping is not required to determine compliance as the hourly emission limitation is based on the emissions unit's maximum potential usage.

For coatings- 9.0 pounds of VOC per gallon x 0.38 gallon of coating per hour.

For cleanup- 7.75 pounds of VOC per gallon x 0.03 gallon per hour.

Emission Limitation:

The emissions of VOC from emissions units R001 through R006 and R008 through R013, combined shall not exceed 51.30 tons per year based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month summation of VOC emission limitation shall be determined by adding the annual emissions from coating and cleanup usage. Annual VOC emissions from coating shall be determined by multiplying the VOC content of applied coatings by the rolling, 12-month summation of the usage. Annual VOC emissions from cleanup are determined by multiplying the VOC content of the cleanup by the rolling, 12-month summation of the usage. The annual emissions from the coating and cleanup are then summed and divided by 2000 lbs/ton to determine compliance with the annual emission limitation on a rolling, 12-month summation. Compliance shall be based upon the record keeping requirements as specified in term and condition C.2.

Emission Limitation:

The total allowable emissions of Hazardous Air Pollutants (HAPs) from the emissions units identified in term and condition A.2.a shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs.

Applicable Compliance Method:

Compliance with the HAP emission limitations shall be based on the recordkeeping requirements established in term C.3.

2. USEPA methods 24 and 24A shall be used to determine the VOC content for coatings and cleanup materials. If, pursuant to Method 24, 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 precision statements for Method 24 or 24A.

3. Operational Restriction:

The maximum annual coating usage for emissions units R001-R006 and R008-R013 combined shall not exceed 5200 gallons after subtracting out the amount of waste recovered. Compliance with the above limitation shall be based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the operational restriction in term B.1 shall be determined by the record keeping required in term C.2.

4. Operational Restriction:

The maximum annual cleanup material usage for emissions units R001-R006 and R008-R013 combined shall not exceed 7200 gallons after subtracting out the amount of waste recovered. Compliance with the above limitation shall be based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the operational restriction in term B.2 shall be determined by the record keeping required in term C.2.

5. Operational Restriction:

The maximum daily coating usage for this emissions unit shall not exceed 3 gallons, as applied, when coating miscellaneous metal parts.

Applicable Compliance Method:

Compliance with the operational restriction in term B.3 shall be determined by the record keeping required in term C.1.

F. **Miscellaneous Requirements**

1. The following terms of this permit to install shall be federally enforceable: A, B, C.1, through C.3, D, and E.