



State of Ohio Environmental Protection Agency

Street Address:
122 S. Front Street

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Mailing Address:
Lazarus Gov. Center
P.O. Box 1049

**RE: DRAFT PERMIT TO INSTALL
GREENE COUNTY
Application No: 08-4095**

CERTIFIED MAIL

DATE: October 14, 1999

Wright Patterson Air Force Base
Connie Strobbe
88 ABW/EMP, 5490 Pearson Road
Wright Patterson AFB, OH 45433-5332

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

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

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

Very truly yours,

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

cc: USEPA
REGIONAL AIR POLLUTION CONTROL AGENCY
Kentucky Department of Natural Resources & Environmental Protection Miami Valley Regional Planning Commission
Indiana Office of Air Management

STATE OF OHIO ENVIRONMENTAL PROTECTION
AGENCY

Permit To Install

**Terms and
Conditions**

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

DRAFT PERMIT TO INSTALL 08-4095

Application Number: 08-4095
APS Premise Number: 0829700441
Permit Fee: **To be entered upon final issuance**
Name of Facility: Wright Patterson Air Force Base
Person to Contact: Connie Strobbe
Address: 5490 Pearson Road 88 ABW/EMP
Wright Patterson AFB, OH 45433-5332

Location of proposed air contaminant source(s) [emissions unit(s)]:
**5244 Vincent Avenue, Building 34024
Wright Patterson AFB, Ohio**

Description of proposed emissions unit(s):
**AEROSPACE COMPONENTS AND GROUND EQUIPMENT PAINT SPRAY BOOTH WITH DRY
FILTER SYSTEM; BLDG 34024 (6050).**

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS**A. State and Federally Enforceable Permit To Install General Terms and Conditions****1. Monitoring and Related Recordkeeping and Reporting Requirements**

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous

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calendar quarters. See B.11 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. Fees

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

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8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

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- i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
- ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

10. Permit To Operate Application

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the source(s) covered by this permit.

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B. State Only Enforceable Permit To Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

3. Permit Transfers

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

4. Air Pollution Nuisance

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

5. Termination of Permit To Install

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

6. Construction of New Sources(s)

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

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

7. Public Disclosure

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

8. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

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9. Best Available Technology

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

10. Construction Compliance Certification

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

11. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

C. Permit To Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	3.78

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Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

None.

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None.

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Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
aerospace equipment paint spray booth with dry filter system, Building 34024 (6050)	OAC rule 3745-21-09(U)(2)(e)(i)	less than or equal to 8 gallons/day coating usage
	OAC rule 3745-17-11(B)(1)	0.551 lb/hour particulate emissions
	OAC rule 3745-17-07(A)	Opacity shall not exceed 20%, as a six-minute average, except as provided by rule.
	40 CFR Part 63 Subpart GG	See Section A.I.2.

2. Additional Terms and Conditions

- 2.a The permittee shall comply with the requirements below unless the solvent used is classified as a cleaning solvent that contains no organic HAP or VOC as identified in 40 CFR 63.744(b)(1) or the cleaning solvent contains HAP or VOC at a concentration less than 0.1% for carcinogens or 1.0% for non-carcinogens, as determined from manufacturer's representations:

- i. Place cleaning solvent-laden cloth, paper, or any other absorbent applicators used for cleaning in bags or other closed containers upon completing their use. Ensure

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that these bags and containers are kept closed at all times except when depositing or removing these materials from the container. Use bags and containers of such design so as to contain the vapors of the cleaning solvent. Cotton-tipped swabs used for very small cleaning operations are exempt from this requirement.

- ii. Store fresh and spent cleaning solvents, except semi-aqueous solvent cleaners, used in aerospace cleaning operations in closed containers.
- iii. Conduct the handling and transfer of cleaning solvents to or from enclosed systems, vats, waste containers, and other cleaning operation equipment that hold or store fresh or spent cleaning solvents in such a manner that minimizes spills.

2.b The permittee shall use cleaning solvents for hand-wipe cleaning operations that meet one of the requirements specified below: (Cleaning solvent containing HAP or VOC at a concentration less than 0.1% for carcinogens or 1.0% for non-carcinogens, as determined from manufacturer's representations are exempt from these requirements)

- i. Meet one of the composition requirements in 40 CFR 63.744(b)(1).
- ii. Have a composite vapor pressure of 45 mm Hg (24.1 in. H₂O) or less at 20 deg. C (68 deg. F).

2.c The permittee shall use one or more of the techniques, or their equivalent, specified below to clean spray guns. Spray gun cleaning operations using cleaning solvent solutions that contain HAP or VOC at a concentration less than 0.1% for carcinogens or 1.0% for non-carcinogens, as determined from manufacturer's representations are exempt from these requirements. Cleaning of the nozzle tips of automated spray equipment systems, except for robotic systems that can be programmed to spray into a closed container, shall be exempt from these requirements.

- i. Enclosed system - The permittee shall clean the spray gun in an enclosed system that is closed at all times except when inserting or removing the spray gun. Cleaning shall consist of forcing solvent through the gun. If leaks are found during the monthly inspection, repairs shall be made as soon as practicable, but no later than 15 days after the leak was found. If the leak is not repaired by the 15th day after detection, the cleaning solvent shall be removed and the enclosed cleaner shall be shut down until the leak is repaired or its use is permanently discontinued.
- ii. Nonatomized cleaning - The permittee shall clean the spray gun by placing cleaning solvent in the pressure pot and forcing it through the gun with the

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atomizing cap in place. No atomizing air is to be used. The permittee shall direct the cleaning solvent from the spray gun into a vat, drum, or other waste container that is closed when not in use.

- iii. Disassembled spray gun cleaning - The permittee shall disassemble the spray gun and clean the components by hand in a vat, which shall remain closed at all times except when in use. Alternatively, the permittee shall soak the components in a vat, which shall remain closed during the soaking period and when not inserting or removing components.
 - iv. Atomizing cleaning - The permittee shall clean the spray gun by forcing the cleaning solvent through the gun and direct the resulting atomized spray into a waste container that is fitted with a device designed to capture the atomized cleaning solvent emissions.
- 2.d** The permittee shall conduct the handling and transfer of primers and topcoats to or from containers, tanks, vats, vessels and piping systems in such a manner that minimizes spills.
- 2.e** Organic HAP and VOC content levels - The permittee shall comply with the organic HAP and VOC content limits specified below:
- i. Organic HAP emissions from primers shall be limited to an organic HAP content level of no more than 350 g/l (2.9 lb/gal) of primer (less water) as applied.
 - ii. VOC emissions from primers shall be limited to a VOC content level of no more than 350 g/l (2.9 lb/gal) of primer (less water and exempt solvents) as applied.
 - iii. Organic HAP emissions from topcoats shall be limited to an organic HAP content level of no more than 420 g/l (3.5 lb/gal) of coating (less water) as applied. Organic HAP emissions from self-priming topcoats shall be limited to an organic HAP content level of no more than 420 g/l (3.5 lb/gal) of self-priming topcoat (less water) as applied.
 - iv. VOC emissions from topcoats shall be limited to a VOC content level of no more than 420 g/l (3.5 lb/gal) of coating (less water and exempt solvents) as applied. VOC emissions from self-priming topcoats shall be limited to a VOC content level of no more than 420 g/l (3.5 lb/gal) of self-priming topcoat (less water and exempt solvents) as applied.
- 2.f** The permittee shall use brush coating, roll coating, electrostatic spraying, high volume low pressure (HVLV) spraying, and/or cotton-tipped swab application techniques for the application of all primers and topcoats.
- 2.g** Inorganic HAP emissions - The permittee shall apply coatings that contain inorganic HAP emissions in a booth or hangar in which air flow is directed downward onto or across the part or assembly being coated and exhausted through one or more outlets.

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- 2.h** Inorganic HAP emissions - dry filter - The permittee shall control the air stream from this operation by passing the air stream through a dry particulate filter system certified using methods described in 40 CFR 63.750(o) to meet or exceed the efficiency requirement in 40 CFR 63.745(g)(2)(i)(A) before exhausting it to the atmosphere. The permittee shall install a differential pressure gauge across the filter banks. The permittee shall maintain the system in good working order and take corrective action when the pressure drop exceeds or falls below the filter manufacturer's recommended limit(s).
- 2.i** Inorganic HAP emissions - dry filter - If the pressure drop across the dry particulate filter system is outside the limit(s) specified by the filter manufacturer or in locally prepared operating procedures, or the booth manufacturer's or locally prepared maintenance procedures for the filter system have not been performed as scheduled, the permittee shall shut down the operation immediately and take corrective action. The operation shall not be resumed until the pressure drop is returned within the specified limit(s).
- 2.j** Inorganic HAP emissions - water wash / filter - The requirements of terms A.I.2.g thru i do not apply to the following:
- a. touch-up of scratched surfaces or damaged paint;
 - b. hole daubing for fasteners;
 - c. touch-up of trimmed edges;
 - d. coating prior to joining dissimilar metal components;
 - e. stencil operations performed by brush or air brush;
 - f. section joining;
 - g. touch-up of bushings and other similar parts;
 - h. sealant detackifying; and,
 - i. painting parts in an area identified in a Title V permit, where the permitting authority has determined that it is not technically feasible to paint the parts in a booth.
- 2.k** All priming & Topcoat operations - The requirements of terms A.I.2.d thru i do not apply to the use of specialty coatings, adhesives, adhesive bonding primers, or sealants at aerospace facilities. The requirements of terms A.I.2.d thru i also do not apply to primers, topcoats, and cleaning solvents containing HAP or VOC at a concentration less than 0.1% for carcinogens or 1.0% for non-carcinogens, as determined from manufacturer's representations.
- 2.l** All priming & Topcoat operations - The requirements of terms A.I.2.d thru i do not apply to the use of low-volume coatings in these categories for which the annual total of each

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separate formulation used at a facility does not exceed 189 l (50 gal), and the combined annual total of all such primers, topcoats, and chemical milling maskants used at a facility does not exceed 757 l (200 gal). Primers and topcoats exempted under A.I.2.k are not included in the 50 and 200 gallon limits.

- 2.m** The permittee shall conduct the handling and transfer of the waste that contains HAP to or from containers, tanks, vats, vessels, and piping systems in such a manner that minimizes spills.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

1. Enclosed Spray Gun Cleaners - If the permittee employs an enclosed spray gun cleaner shall visually inspect the seals and all other potential sources of leaks associated with each enclosed gun spray cleaner system at least once per month. Each inspection shall occur while the system is in operation.
2. Cleaning operation - The permittee shall maintain the following information for the cleaning operation, as appropriate:

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- a. The name, vapor pressure, and documentation showing the organic HAP constituents of each cleaning solvent used for affected cleaning operations at the facility.
 - b. For each cleaning solvent used in hand-wipe cleaning operations that complies with the composition requirements specified in 40 CFR 63.744(b)(1):
 - i. The name of each cleaning solvent used.
 - ii. All data and calculations that demonstrate that the cleaning solvent complies with one of the composition requirements.
 - iii. Annual records of the volume of each solvent used, as determined from facility purchase records or usage records.
 - c. For each cleaning solvent used in hand-wipe cleaning operations that does not comply with the composition requirements in 40 CFR 63.744(b)(1), but does comply with the vapor pressure requirement above:
 - i. The name of each cleaning solvent used.
 - ii. The composite vapor pressure of each cleaning solvent used.
 - iii. All vapor pressure test results, if appropriate, data, and calculations used to determine the composite vapor pressure of each cleaning solvent.
 - iv. The amount (in gallons) of each cleaning solvent used each month at each operation.
 - d. A record of all leaks from enclosed spray gun cleaners identified during the inspection that includes for each leak found:
 - i. Source identification.
 - ii. Date leak was discovered.
 - iii. Date leak was repaired.
3. Primer & Topcoat - organic HAP and VOC - The permittee shall maintain the following information for the prime coat and topcoat application operations, as appropriate:
- a. The name and VOC content as received and as applied of each primer and topcoat used at the facility.
 - b. The mass of organic HAP emitted per unit volume of coating as applied (less water) (H) and the mass of VOC emitted per unit volume of coating as applied (less water and exempt solvents) (G) for each coating formulation within each coating category used each month (as calculated using the procedures specified in 63.750(c) and (e)).

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- c. All data, calculations, and test results (including EPA Method 24 results) used in determining the values of H and G above.
- d. The volume (gal) of each coating formulation within each coating category used each month.

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4. Inorganic HAP emissions - dry filter- The permittee shall continuously monitor the pressure drop across the filter and read and record the pressure drop once per shift while primer or topcoat application operations are occurring. This log shall include the acceptable limit(s) of pressure drop as specified by the filter or booth manufacturer or in locally prepared operating procedures.
5. The permittee shall collect and record the following information each day for the coating line:
 - 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 of the coatings employed.

IV. Reporting Requirements

1. Cleaning operation - The permittee shall submit semi-annual reports occurring every 6 months from the date of the notification of compliance status that identify:
 - a. Any instance where a non-compliant cleaning solvent is used for hand-wipe cleaning operation;
 - b. A list of any new cleaning solvents used for hand-wipe cleaning in the previous 6 months and, as appropriate, their composite vapor pressure or notification that they comply with the composition requirements specified in 40 CFR 63.744(b)(1).
 - c. Any instance where a non-compliant spray gun cleaning method is used.
 - d. Any instance where a leaking enclosed spray gun cleaner remains unrepaired and in use for more than 15 days.
 - e. If the operations have been in compliance for the semi-annual period, a statement that the cleaning operations have been in compliance with the applicable standards. Sources shall also submit a statement of compliance signed by a responsible company official certifying that the facility is in compliance with all applicable requirements.
2. Primer & Topcoat operations - The permittee shall submit semi-annual reports occurring every 6 months from the date of the notification of compliance status that identify:
 - a. Each value of H and G recorded above (see A.III.3.) that exceeds the applicable organic HAP or VOC content limit.

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- b. All times when a primer or topcoat application operation was not immediately shut down when the pressure drop across a dry particulate filter system was outside the limit(s) specified by the filter or booth manufacturer or in locally prepared operating procedures.

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- c. If the operations have been in compliance for the semi-annual period, a statement that the operations have been in compliance with the applicable standards.
3. Dry filter only - The permittee shall submit annual reports occurring every 12 months from the date of the notification of compliance status that identify the number of times the pressure drop for dry filter system was outside the limit(s) specified by the filter or booth manufacturer or in locally prepared operating procedures.
4. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation -
 less than or equal to 8 gallons/day coating usage

 Applicable Compliance Method -

 Compliance shall be based upon record keeping as specified in A.III.5.
 - b. Emission Limitation -
 0.551 lb/hour particulate emissions

 Applicable Compliance Method -

 To determine the actual worst case emissions rate for particulates, the following equation shall be used:

$$E = \text{maximum coating solids usage rate in pounds per hour} \times (1 - TE) \times (1 - CE)$$

$$E = \text{particulate matter emission rate (lbs/hour)}$$

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

CE = control efficiency of the control equipment

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- c. Emission Limitation -
20% opacity, as a six-minute average

Applicable Compliance Method -

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

- 2. Formulation data or USEPA method 24 shall be employed to measure the VOC content for all coatings and cleanup materials.

VI. Miscellaneous Requirements

None.

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B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
aerospace equipment paint spray booth with dry filter system, Building 34024 (6050)	OAC rule 3745-31-05(A)(3)	39.2 lbs/day and 3.78 volatile organic compounds (VOC)

2. Additional Terms and Conditions

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated through the coating usage limitation specified in A.I.1., record keeping, and reporting, and compliance with the limits in B.I.1.
- 2.b The 39.2 lbs/day limitation is being developed for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.
- 2.c The cleanup material employed in this emissions unit is acetone. Acetone is exempt from the definition of volatile organic compounds in OAC rule 3745-21-01(B)(6) and is therefore not included in the daily and annual allowable emission limitations.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the purpose of determining annual VOC emissions:

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- a. The name and identification of each coating employed.
- b. The volume of each coating employed, in gallons.
- c. The VOC content of each coating, as applied, in pounds per gallon.
- d. The total VOC emissions from all coatings employed, in pounds or tons.

IV. Reporting Requirements

1. See A.IV.4.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section B.I. of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation -
39.2 lbs/day VOC

Applicable Compliance Method -

Compliance shall be determined by multiplying the maximum daily usage rate by the maximum VOC content of all coatings employed.
 - b. Emission Limitation -
3.78 TPY VOC

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in B.III.1. and shall be the sum of the monthly VOC emission rates for the calendar year.

VI. Miscellaneous Requirements

None.