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Facility Name: **CHASE INDUSTRIES**

Application Number: **14-4578**

Date: **June 24, 1998**

**GENERAL PERMIT CONDITIONS**

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

NOTICE OF INSPECTION

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

CONSTRUCTION OF NEW SOURCE(S)

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

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Ohio Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of Ohio Administrative Code

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(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.

#### PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 15 days of the effective date of this permit to install.

#### PUBLIC DISCLOSURE

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

#### APPLICABILITY

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

#### 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.

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PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be made at least 90 days prior to start-up of the source.

NINETY DAY OPERATING PERIOD

The facility will be permitted to operate during a 90-day period in accordance with OAC Rule 3745-35-02(C)(4)(b). The purpose of this period of operation is to fulfill the performance tests conditions used in the determination of compliance with the provisions of this Permit to Install or other applicable Ohio EPA rules.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies.

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

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

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>
K002 Modifi- cation	Adhesive Coating Line

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(U) (2) (f)

	<u>BAT Determination</u>	*The emissions limits established by this rule are less stringent than those established by Ohio Administrative Code rule 3745-31-05 (BAT).	<u>Applicable Federal &amp; OAC Rules</u> 3745-15-07	
	Bat is satisfied by usage and emissions limits, use of non-photochemically reactive materials and compliance with the Air Toxics Policy.		3745-31-05	
			3745-17-07 (A) (1)	
			3745-17-11 (B) (1)	
			3745-21-07 (G) (2) *	
			3745-21-09	

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	See Additional Special Term and Condition A, 3			
	0.551 lb PM-PM <sub>10</sub> /HR			
	2.41 TPY PM-PM <sub>10</sub>			
	Less stringent			
	See 3745-31-05			

55 lbs  
 OC/DAY  
 & 5.72  
 TPY for  
 coating  
 metal  
 parts,

55 lbs  
 OC/DAY  
 & 5.72  
 TPY for  
 coating  
 non-met  
 al  
 parts

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SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
Organic Compound	11.44
PM	2.41**
PM <sub>10</sub>	2.41**

\*\* Assume PM = P<sub>10</sub>

**REPORTING REQUIREMENTS**

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Ohio EPA, Hamilton County, Department of Environmental Services.**

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**WASTE DISPOSAL**

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

**MAINTENANCE OF EQUIPMENT**

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

**MALFUNCTION/ABATEMENT**

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **Ohio EPA, Hamilton County, Department of Environmental Services**.

Except as provided by OAC Rule 3745-15-06(A) (3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

**AIR POLLUTION NUISANCES PROHIBITED**

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

**CONSTRUCTION COMPLIANCE CERTIFICATION**

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

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**ADDITIONAL SPECIAL TERMS AND CONDITIONS**

**A. Applicable Emission Limitations and/or Control Requirements**

1. The organic compound (OC) emissions from emissions unit K002 shall not exceed 55 pounds per day and 5.72 tons per year from coating metal parts.
2. The organic compound (OC) emissions from emissions unit K002 shall not exceed 55 pounds per day and 5.72 tons per year from coating non-metal parts.
3. Visible particulate emissions shall not exceed 20% percent opacity, as a six-minute average, except as specified by rule.

**B. Operational Restrictions**

1. The maximum coating usage in emissions unit K002 shall not exceed 10 gallons per day and 2080 gallons per year for coating metal parts.
2. The maximum coating usage in emissions unit K002 shall not exceed 10 gallons per day and 2080 gallons per year for coating non-metal parts.
3. The OC content of coatings employed in emissions unit K002 shall not exceed 5.5 pounds per gallon, as applied, including water and exempt solvents.
4. The use of photochemically reactive material as defined in OAC rule 3745-21-01(C)(5) is prohibited.

**C. Monitoring and Recordkeeping Requirements**

1. The permittee shall collect and record the following information for each day for the coating operation:
  - a. the name and identification number of each coating employed;
  - b. the OC content of each coating, in pounds per gallon, as applied, including water and exempt solvents;

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- c. the volume, in gallons, of each coating employed for coating metal parts;
  - d. the total volume, in gallons, of all coatings employed for coating metal parts;
  - e. the daily OC emissions from coating metal parts, calculated by taking the sum of (b) times (c) for each coating employed for coating metal parts;
  - f. the volume, in gallons, of each coating employed for coating non-metal parts;
  - g. the total volume, in gallons, of all coatings employed for coating non-metal parts; and,
  - h. the daily OC emissions from coating non-metal parts, calculated by taking the sum of (b) times (f) for each coating employed for coating non-metal parts.
2. 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 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.

**D. Reporting Requirements**

1. The permittee shall submit required reports in the following manner:
  - a. reports of any required monitoring and/or recordkeeping information shall be submitted to the Ohio EPA, Hamilton County, Department of Environmental Services; and,
  - b. except as otherwise may be provided in the terms and conditions for a specific emissions unit,

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quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA, Hamilton County, Department of Environmental Services. 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 30, April 30, July 30, and October 30 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).

2. The permittee shall notify the Director (the Ohio EPA, Hamilton County, Department of Environmental Services) in writing of any daily record showing that the emissions unit exceeded any usage, OC content and/or emissions limit. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Hamilton County, Environmental Services) within 45 days after the exceedance occurs.

**E. Compliance Methods/Testing Requirements**

1. USEPA methods 24 and 24A shall be used to determine the VOC content for (a) coatings and (b) flexographic and rotogravure printing lines and related coatings, respectively. If, pursuant to section 4.3 of 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 or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

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2. Compliance with the usage and emissions limits shall be demonstrated by the record keeping in Term C.1.
3. Compliance with the visible emissions limitation shall be determined by the methods outlined in Ohio Administrative Code (OAC) rule 3745-17-03(B) (1).

**F. Miscellaneous Requirements**

1. The following terms and conditions shall supersede all the air pollution control requirements for this emissions unit contained in the permit to install application number 14-4406 as issued on October 22, 1997:

Terms A thru F.

2. This permit allows the use of the coatings and cleanup materials specified by the permittee in the application for PTI number 14-4578. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the OC emission limitation(s) specified in this permit was (were) established in accordance with the Ohio EPA's "Air Toxics Policy" and is (are) based on both the coating and cleanup material formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the Screen 3 model and a comparison of the predicted 1 hour maximum ground-level concentration to the MAGLC. The following summarizes the results of the modeling for each pollutant:

**Pollutant: Toluene**

**TLV (ug/m3): 188,000**

**Maximum Hourly Emission Rate (lbs/hr): 2.2**

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**Predicted 1 Hour Maximum Ground-Level Concentration at  
the Fenceline (ug/m3): 3450  
Maximum Acceptable Ground-Level Concentration (MAGLC)  
(ug/m3): 4476**

Any of the following changes may be deemed a "modification" to the emissions unit and, as such, prior notification to and approval from the Ohio EPA, Hamilton County, Department of Environmental Services are required, including the possible issuance of modifications to PTI number 14-4578 and the operating permit:

- a. any changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
- b. any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of any MAGLC specified in the above table;
- c. any change to the emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01;
- d. any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in the emission of any of the exempted organic compounds included in the definition of "VOC" [OAC rule 3745-21-01(B)(6)]; and,
- e. Any change in the composition of the coatings or

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cleanup materials, or use of new coatings or cleanup materials, that would result in an increase in emissions of any "Hazardous Air Pollutants" (HAPS) as defined in OAC rule 3745-77-01 (V) .