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Facility Name: **Skilcraft Security Equipment**

Application Number: **14-4602**

Date: **August 26, 1998**

GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

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

NOTICE OF INSPECTION

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

CONSTRUCTION OF NEW SOURCES

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

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of Ohio Administrative Code (OAC) Rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as

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an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet applicable standards.

PERMIT TO INSTALL FEE

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

PUBLIC DISCLOSURE

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

APPLICABILITY

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

BEST AVAILABLE TECHNOLOGY

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

PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule

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3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

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

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AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Skilcraft Security Equipment** located in **Hamilton** 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>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
K001	Misc. Metal Parts Coating Line	VOC Content Limitations, Usage Limitations and Compliance with Ohio's Air Toxics Policy	3745-15-07	See Additional Special Term and Condition F.1.
			3745-17-07	See Additional Special Term and Condition A.3.
			3745-17-11	0.551 lbs/hr and 2.41 tpy PM/PM10
			3745-21-09 (U) (1) (i)	See Additional Special Term and Condition A.2.
			3745-31-05	113.2 lbs/day and 7.7 tpy VOC

SUMMARY

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TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
Organic Compound	7.7
PM	2.41 *
PM ₁₀	2.41 *

* Assume PM = PM₁₀

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Hamilton County Dept. of Environmental Services, 1632 Central Parkway, Cincinnati, Ohio 45210.**

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 **Hamilton County Dept. of Environmental Services, 1632 Central Parkway, Cincinnati, Ohio 45210.**

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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.

CONSTRUCTION COMPLIANCE CERTIFICATION

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

ADDITIONAL SPECIAL TERMS AND CONDITIONS

A. Applicable Emission Limitations and/or Control Requirements:

1. The maximum VOC emissions from emissions unit K001 shall not exceed 113.2 pounds per day and 7.7 tons per year. The maximum PM/PM₁₀ emissions from emissions unit K001 shall not exceed 0.551 pound per hour and 2.41 tons per year.
2. The VOC emissions (as applied) from each coating employed in emissions unit K001 shall not exceed 3.0 pounds of VOC per gallon of coating, excluding water and exempt solvents. The VOC emissions from each clean-up material employed in emissions unit K001 shall not exceed 6.9 pounds of VOC per gallon.
3. Visible particulate emissions from emissions unit K001 shall not exceed 20% opacity, as a six-minute average, except as specified by rule.

B. Operational Restrictions:

1. The maximum daily coating usage for emissions unit K001 shall not exceed 36 gallons and the maximum daily clean-up material usage shall not exceed 0.75 gallons.

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2. The maximum annual coating usage for emissions unit K001 shall not exceed 4500 gallons and the maximum annual clean-up material usage shall not exceed 273.75 gallons.

C. Monitoring and Recordkeeping Requirements:

1. The permittee shall collect and record the following information each day for emissions unit K001:
 - a. the name and identification number of each coating and each clean-up material employed;
 - b. the VOC content (excluding water and exempt solvents) of each coating material, as applied, and the VOC content of each clean-up material employed, in pounds per gallon;
 - c. the number of gallons of each coating and clean-up material employed; and,
 - d. the total VOC emissions for all coatings and clean-up materials, in pounds per day (b X c).
2. Each record required pursuant to this permit shall be retained for a period of five years from the date the record was created. Such records may be maintained in computerized form.

D. Reporting Requirements:

1. The permittee shall notify the Director (Hamilton County Dept. of Env. Services) in writing of any daily record showing the use of noncomplying coatings or an exceedance of the daily usage limitation. The notification shall include a copy of such record and shall be sent to the Director (Hamilton County Dept. of Env. Services) within 30 days after the exceedance occurs.
2. The permittee shall also submit annual reports which specify the total VOC emissions from emissions unit K001 for the previous calendar year. These reports shall be submitted by January 30 of each year.
3. 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 Hamilton County Dept. of Env. Services;

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- 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 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 preventative measures which have been or will be taken, shall be submitted to the Hamilton County Dept. of Env. 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).

E. Compliance Methods/Testing Requirements:

1. Compliance with the VOC emission limit in Section A.1 of these terms and conditions shall be determined by multiplying the VOC content of each coating and clean-up material employed by the amount of each coating and clean-up material employed.
2. Compliance with the PM/PM₁₀ emission limit in Section A.1. of these terms and conditions shall be determined in accordance with the following equation:

amount of coating used per hour x percent solids in coating x density of coating x 1 - transfer efficiency (0.40) x 1 - control efficiency (0.10)
3. Compliance with the VOC content limitation(s) in Section A.2. of these terms and conditions shall be determined using USEPA Method 24 or 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix

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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 procedures or alternative precision statements for Method 24 or 24A.

4. Compliance with the visible emission limit in Section A.3. of these terms and conditions shall be determined in accordance with OAC rule 3745-17-03(B) (1).

F. Miscellaneous Requirements:

1. If probable cause exists indicating emissions unit K001 is causing or contributing to a nuisance in violation of OAC rule 3745-15-07, the owner or operator of emissions unit K001 shall be required to submit and implement a control program which will bring the emissions unit into compliance.
2. This permit allows the use of the coatings and cleanup materials specified by the permittee in the application for PTI number 14-4602. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the VOC 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 Screen3 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: Methyl Isobutyl Ketone (see attached

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toxic screening demonstration)

TLV (ug/m3): 205,000

Maximum Hourly Emission Rate (lbs/hr): 7.0

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 331

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 4881

Any of the following changes may be deemed a "modification" to the emissions unit and, as such, prior notification to and approval from the Hamilton County Dept. of Env. Services are required, including the possible issuance of modifications to PTI number 14-4602 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 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).

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