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Facility Name: **U S Precision Lens**

Application Number: **14-4604**

Date: **September 2, 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.

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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 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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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & 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 **U S Precision Lens** located in **Clermont** 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>
R003	Miscellaneous Emissions, OC content and usage limitations.		3745-15-07	See General Terms
Modi-fi-non-metal cation parts paint spray booth	Compliance with Air Toxics Policy.		3745-17-07	See Term and Condition A.4.
			3745-17-11 (B) *	Less stringent than OAC rule 3745-31-05.
			3745-21-07 (G)	Exempt
			3745-31-05	111 pounds OC/day 2.3 TPY OC 0.13 pound PM/PM ₁₀ /hour 0.57 TPY PM/PM ₁₀

* Limitations established by this rule are less stringent than

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the limitations established by OAC rule 3745-31-05.

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SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
Organic Compound	2.3
PM	0.57
PM ₁₀	0.57

REPORTING REQUIREMENTS

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

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled

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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.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

A. Applicable Emission Limitations and/or Control Requirements

1. For pounds per day and annual emissions limitations for this emissions unit see the Air Emissions Summary page of this permit.
2. The maximum organic compound (OC) content of the coatings employed in this emissions unit shall not exceed 6.2 pounds of OC per gallon of coating, as applied, including water and exempt solvents.
3. The maximum OC content of the cleanup material employed in this emissions unit shall not exceed 6.7 pounds of OC per gallon of cleanup material.
4. Visible particulate emissions from this emissions unit shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.

B. Operational Restrictions

1. The maximum daily coating usage for this emissions unit shall not exceed 16.8 gallons per day including water and exempt solvents.
2. The maximum annual coating usage for this emissions unit shall not exceed 600 gallons per year including water and exempt solvents.
3. The maximum daily cleanup material usage for this

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emissions unit shall not exceed 1 gallon per day.

4. The maximum daily cleanup material usage for this emissions unit shall not exceed 120 gallons of cleanup material per year.
5. The use of photochemically reactive materials 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 month for this emissions unit for the purpose of determining annual OC emissions:
 - a. the company identification for each coating and cleanup material employed;
 - b. the number of gallons, of each coating employed per month, including water and exempt solvents;
 - c. the number of gallons, of each cleanup material employed per month;
 - d. the OC content of each coating, in pounds per gallon including water and exempt solvents, as applied;
 - e. the OC content of each cleanup material, in pounds per gallon;
 - f. the total OC emission rate for all the coatings and cleanup materials, in tons per month. The sum of $[(b * d) + (c * e)]/2000$; and,
 - g. a record of each coating and cleanup material employed in this emissions unit, indicating whether or not the coating and/or cleanup material is photochemically reactive as defined in OAC rule 3745-21-01(C) (5).
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

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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 Hamilton County Dept. of Env. Services; and,
 - 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 preventive 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.)
2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the following for this emissions unit:
 - a. an exceedance of the annual coating and/or cleanup material usage limitations;
 - b. an exceedance of the coating and/or cleanup

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material OC content limitations;

- c. an exceedance of the annual OC emission rate limitation; and,
- d. the use of coatings and/or cleanup materials which are photochemically reactive, as defined in OAC 3745-21-01(C) (5).

E. Compliance Methods/Testing Requirements

1. Compliance with the visible emissions limitations in Section A.4. shall be determined by Method 9, 40 CFR Part 60, Appendix A.
2. Compliance with the particulate emission limitation shall be demonstrated by the following:
 - a. $\text{Lbs/Hr.} = \text{Weight of gallon of coating} \times \text{percent by weight of solids} \times \text{gallons of coatings per hour} \times 1 - \text{TE}(\text{transfer eff.}) \times 1 - \text{CE}(\text{control eff.})$, where TE = 25 percent and CE = 90 percent.
 - b. $\text{TPY} = \text{Weight of gallon of coating} \times \text{percent by weight of solids} \times \text{gallons of coatings per year} \times 1 - \text{TE}(\text{transfer eff.}) \times 1 - \text{CE}(\text{control eff.}) \times 1/2000$, where TE = 25 percent and CE = 90 percent.
3. Compliance with the daily and annual OC emission rates shall be determined by multiplying the OC content of each coating and organic cleanup material employed (in pounds per gallon, as applied, including water and exempt solvents) by the coating and organic cleanup material usage rate (in gallons) and totaling the sum of OC emission rates for all coatings and cleanup materials.
4. Formulation data or USEPA Methods 24 or 24A shall be used to determine the OC contents of the coatings and cleanup materials employed in this emissions unit.
5. Compliance with the coating and cleanup material usage limitations shall be determined by the recordkeeping

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requirements in section C.1. of this permit.

F. Miscellaneous Requirements

1. The daily emission limitations outlined in this permit is based upon the emission unit's PTE. Therefore, no daily records are required to demonstrate compliance with these limits.
2. This permit allows the use of the coatings and cleanup materials specified by the permittee in the application for PTI number 14-4604. 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 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: 4-Methyl 2-Pentanone

TLV (ug/m3): 205,000

Maximum Hourly Emission Rate (lbs/hr): 4.34

Predicted 1 Hour Maximum Ground-Level Concentration at or beyond the Fenceline (ug/m3): 752

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. Service are required, including the possible issuance of modifications to PTI number 14-4604 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

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(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).
3. The Additional Special Terms and Conditions of this Permit to Install (PTI) shall supersede the Additional Special Terms and Conditions of PTI 14-1235.