



Street Address:

State of Ohio Environmental Protection Agency

Mailing Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Lazarus Gov. Center

**RE: DRAFT PERMIT TO INSTALL  
BUTLER COUNTY  
Application No: 14-4726**

**CERTIFIED MAIL**

**DATE:** June 16, 1999

O'Gara-Hess & Eisenhardt Armoring  
Michael A Klemt  
9113 LeSaint Drive  
Fairfield, OH 45014

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 of 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 **\$400** 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, buy 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  
HAMILTON COUNTY DEPT. OF ENV SERVICES  
IN  
KY

OH-KY-IN Reg Coun of Govt

**Permit To Install  
Terms and  
Conditions**

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

**DRAFT CHAPTER 31 MODIFICATION OF PERMIT TO INSTALL 14-4726**

Application Number: 14-4726  
APS Premise 1409030600  
Number:  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: O'Gara-Hess & Eisenhardt Armoring  
Person to Contact: Michael A Klemt  
Address: 9113 LeSaint Drive  
Fairfield, OH 45014

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**9113 LeSaint Drive  
Fairfield, OHIO**

Description of proposed emissions unit(s):  
**(2) PAINT SPRAY BOOTHS FOR COMMERCIAL & MILITARY VEHICLE COATING -  
MODIFICATION TO PTI 14-3975.**

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

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Director

## Part I - GENERAL TERMS AND CONDITIONS

### A. 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 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 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. Records Retention Requirements

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.

#### 4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon

the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. 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 verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

#### **5. 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 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. 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 emissions unit(s) that is (are) served by such control system(s).

#### **6. 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.

#### **7. 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.

#### **8. 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.

## **9. 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.

## **10. 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.

## **11. 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).

## **12. 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.

**13. Source Operation and Operating Permit Requirements 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, 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 emissions unit(s) covered by this permit.

**14. 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.

**15. 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.

**B. 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	38.48

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. 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>
Paint spray booth for commercial and military vehicle coating.	OAC rule 3745-31-05	240.5 lbs. VOC/day, 19.24 TPY VOC; See Term A.2.a.
	OAC rule 3745-21-09(U)(2)(d)	Less stringent than OAC rule 3745-31-05.
	Synthetic minor to avoid Title V operating permit requirements and Emissions Offset Policy (Nonattainment Review)	See Terms A.2.b. and B.1.

**2. Additional Terms and Conditions**

- 2.a The VOC content of each coating and cleanup material employed in this emissions unit shall not exceed 7.4 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.
- 2.b The total allowable usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation. The permittee has existing records to demonstrate compliance with the rolling, 12-month summation upon permit issuance.

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PTI A<sub>1</sub>

**Draft PTI (Date will be entered upon final issuance)**

Emissions Unit ID: **K005**

- 2.c** Compliance with OAC rule 3745-31-05 shall be demonstrated by the coating and cleanup material usage limitations, the VOC content limitations and Ohio EPA Air Toxics Policy.

**Draft PTI (Date will be entered upon final issuance)****B. Operational Restrictions**

1. The maximum annual coating and cleanup material usage for this emissions unit shall not exceed 32.5 gallons per day and 5200 gallons per year, based upon a rolling, 12-month summation of the coating and cleanup material usage figures. The permittee has existing records to demonstrate compliance with the rolling, 12-month summation upon permit issuance.

**C. Monitoring and/or Recordkeeping Requirements**

1. This facility shall maintain daily records for emissions unit K005 which list the following information for each coating and cleanup material employed in this emissions unit:
  - a. the name and identification of each coating and cleanup material;
  - b. the number of gallons of each coating and cleanup material employed;
  - c. the volatile organic compound (VOC) content of each coating and cleanup material, in pounds per gallon (as applied); and,
  - d. the total VOC emissions in pounds per day.
2. The permittee shall collect and record the following information each month for the entire facility:
  - a. the name and identification number of each coating, employed;
  - b. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
  - c. the total combined HAP content of each coating in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (b)];
  - d. the number of gallons of each coating employed;
  - e. the name and identification of each cleanup material employed;
  - f. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;
  - g. the total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied [sum all the individual HAP contents from (f)];

- h. the number of gallons of each cleanup material employed;
  - i. the total individual HAP usages for each HAP from all coatings and cleanup materials employed, in pounds or tons per month (for each HAP the sum of (b) times (d) for each coating plus the sum of (f) times (h) for each cleanup material);
  - j. the total combined HAP usages from all coatings and cleanup materials employed, in pounds or tons per month (the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material);
  - k. the updated rolling, 12-month summation of usages for each individual HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and,
  - l. the updated rolling, 12-month summation of usages for total combined HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
    - \* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.
- This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.
3. The permittee shall maintain monthly records of the following information:
    - a. the coating and cleanup material usage for each month; and,
    - b. the updated rolling, 12-month summation of the coating and cleanup material usage figures.
  4. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
    - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and,
    - b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

**D. Reporting Requirements**

1. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP usage limitations set forth in term A.2.b. The permittee shall submit annual reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year. If no exceedances occurred during the reporting period then a report is required stating so.
2. The permittee shall also submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

**Draft PTI (Date will be entered upon final issuance)**

3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month coating and cleanup material usage limitation and/or the VOC content limitation. If no exceedances occurred during the reporting period then a report is required stating so.

**E. Testing Requirements**

1. Compliance with the usage limits cited in term B.1 shall be demonstrated by the recordkeeping in terms C.1 and C.3.
2. Compliance with the VOC content limits cited in term A.2.a. shall be demonstrated by the recordkeeping in term C.1.
3. Compliance with the HAP emissions limits cited in term A.2.b shall be demonstrated by the recordkeeping in term C.2.
4. 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.

**F. Miscellaneous Requirements**

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant 1: Diethylenetriamine

TLV (ug/m<sup>3</sup>): 4.2

Maximum Hourly Emission Rate (lbs/hr): 0.62

**O'Gara-Hess & Eisenhardt Armoring**

PTI Application: **14-4726**

**Draft**

Facility ID: **1409030600**

Emissions Unit ID: **K005**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 44.22

MAGLC (ug/m3): 100.0

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Pollutant 2: Toluene

TLV (ug/m<sup>3</sup>): 188

Maximum Hourly Emission Rate (lbs/hr): 31.58

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 2253.0

MAGLC (ug/m<sup>3</sup>): 4476

Pollutant 3: Methyl isobutyl ketone

TLV (ug/m<sup>3</sup>): 205

Maximum Hourly Emission Rate (lbs/hr): 31.58

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 1874.0

MAGLC (ug/m<sup>3</sup>): 4881

Pollutant 4: Methyl amyl ketone

TLV (ug/m<sup>3</sup>): 233

Maximum Hourly Emission Rate (lbs/hr): 31.58

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 2362.0

MAGLC (ug/m<sup>3</sup>): 5548

Pollutant 5: Diisobutyl ketone

TLV (ug/m<sup>3</sup>): 145

Maximum Hourly Emission Rate (lbs/hr): 31.58

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 401.7

MAGLC (ug/m<sup>3</sup>): 3452

Pollutant 6: N-butyl alcohol

TLV (ug/m<sup>3</sup>): 152

Maximum Hourly Emission Rate (lbs/hr): 31.58

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 2628.0

MAGLC (ug/m<sup>3</sup>): 3619

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;

**Draft PTI (Date will be entered upon final issuance)**

- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and,
- d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and,
- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would 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, the permittee shall obtain a final permit to install prior to the change.

- 2. The preceding terms and conditions in Parts A thru F shall supersede all the air pollution control requirements for emissions unit K005 contained in the permit to install application number 14-3975 as issued on July 11, 1996.
- 3. The following terms and conditions in this permit to install are federally enforceable:  
  
A.2.b, B.1, C.2, C.3, D.1 and D.3.

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]**

**A. 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 OAC rule</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Paint spray booth for commercial and military vehicle coating.	3745-31-05	240.5 lbs. VOC/day, 19.24 TPY VOC; See term A.2.a.
	OAC rule 3745-21-09(U)(2)(d)	Less stringent than OAC rule 3745-31-05.
	Synthetic minor to avoid Title V operating permit requirements and Emissions Offset Policy (Nonattainment Review)	See terms A.2.b. and B.1.

**2. Additional Terms and Conditions**

- 2.a The VOC content of each coating and cleanup material employed in this emissions unit shall not exceed 7.4 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.
- 2.b The total allowable usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling 12-month summation. The permittee has existing records to demonstrate compliance with the rolling, 12-month summation upon permit issuance.
- 2.c Compliance with OAC rule 3745-31-05 shall be demonstrated by the coating and cleanup

material usage limitations, the VOC content limitations and Ohio EPA Air Toxics Policy.

## **B. Operational Restrictions**

1. The maximum annual coating and cleanup material usage for this emissions unit shall not exceed 32.5 gallons per day and 5200 gallons per year, based upon a rolling, 12-month summation of the coating and cleanup material usage figures. The permittee has existing records to demonstrate compliance with the rolling, 12-month summation upon permit issuance.

## **C. Monitoring and/or Recordkeeping Requirements**

1. This facility shall maintain daily records for emissions unit K005 which list the following information for each coating and cleanup material employed in this emissions unit:
  - a. the name and identification of each coating and cleanup material;
  - b. the number of gallons of each coating and cleanup material employed;
  - c. the volatile organic compound (VOC) content of each coating and cleanup material, in pounds per gallon (as applied); and,
  - d. the total VOC emissions in pounds per day.
2. The permittee shall collect and record the following information each month for the entire facility:
  - a. the name and identification number of each coating, employed;
  - b. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
  - c. the total combined HAP content of each coating in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (b)];
  - d. the number of gallons of each coating employed;
  - e. the name and identification of each cleanup material employed;
  - f. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;

- g. the total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied [sum all the individual HAP contents from (f)];
- h. the number of gallons of each cleanup material employed;
- i. the total individual HAP usage for each HAP from all coatings and cleanup materials employed, in pounds or tons per month (for each HAP the sum of (b) times (d) for each coating plus the sum of (f) times (h) for each cleanup material);
- j. the total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per month (the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material);

- k. the updated rolling, 12-month summation of usages for each individual HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and,
- l. the updated rolling, 12-month summation of usages for total combined HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
  - \* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.

This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.

- 3. The permittee shall maintain monthly records of the following information:
  - a. the coating and cleanup material usage for each month; and,
  - b. the updated rolling, 12-month summation of the coating and cleanup material usage figures.
- 4. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
  - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and,
  - b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

#### **D. Reporting Requirements**

- 1. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP usages limitations set forth in term A.2.b. The permittee shall submit annual reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year. If no exceedances occurred during the reporting period then a report is required stating so.
- 2. The permittee shall also submit annual reports which specify the total VOC emissions from this

emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month coating and cleanup material usage limitation and/or the VOC content limitation. If no exceedances occurred during the reporting period then a report is required stating so.

**E. Testing Requirements**

1. Compliance with the usage limits cited in term B.1 shall be demonstrated by the recordkeeping in terms C.1 and C.3.
2. Compliance with the VOC content limits cited in term A.2.a. shall be demonstrated by the recordkeeping in term C.1.
3. Compliance with the HAP emissions limits cited in term A.2.b shall be demonstrated by the recordkeeping in term C.2.
4. 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.

**F. Miscellaneous Requirements**

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant 1: Diethylenetriamine

TLV (ug/m<sup>3</sup>): 4.2

Maximum Hourly Emission Rate (lbs/hr): 0.62

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 44.22

MAGLC (ug/m<sup>3</sup>): 100.0

Pollutant 2: Toluene

TLV (ug/m<sup>3</sup>): 188

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Maximum Hourly Emission Rate (lbs/hr): 31.58

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2253.0

MAGLC (ug/m3): 4476

Pollutant 3: Methyl isobutyl ketone

TLV (ug/m3): 205

Maximum Hourly Emission Rate (lbs/hr): 31.58

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1874.0

MAGLC (ug/m3): 4881

Pollutant 4: Methyl amyl ketone

TLV (ug/m3): 233

Maximum Hourly Emission Rate (lbs/hr): 31.58

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2362.0

MAGLC (ug/m3): 5548

Pollutant 5: Diisobutyl ketone

TLV (ug/m3): 145

Maximum Hourly Emission Rate (lbs/hr): 31.58

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 401.7

MAGLC (ug/m3): 3452

Pollutant 6: N-butyl alcohol

TLV (ug/m3): 152

Maximum Hourly Emission Rate (lbs/hr): 31.58

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2628.0

MAGLC (ug/m3): 3619

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the materials used, or use of new materials, that would

result in the emission of an air contaminant not previously permitted; and,

- d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and,
- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would 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, the permittee shall obtain a final permit to install prior to the change.

2. The preceding terms and conditions in Parts A thru F shall supersede all the air pollution control requirements for emissions unit K005 contained in the permit to install application number 14-3975 as issued on July 11, 1996:
3. The following terms and conditions in this permit to install are federally enforceable:

A.2.b, B.1, C.2, C.3, D.1 and D.3.