



State of Ohio Environmental Protection Agency

STREET ADDRESS:

Lazarus Government Center  
50 W. Town St., Suite 700  
Columbus, Ohio 43215

TELE: (614) 644-3020 FAX: (614) 644-3184  
www.epa.state.oh.us

MAILING ADDRESS:

P.O. Box 1049  
Columbus, OH 43216-1049

9/22/2009

Greg Pearson  
OPW FUELING COMPONENTS  
9393 Princeton-Glendale Road  
Hamilton, OH 45011

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE  
Facility ID: 1409000070  
Permit Number: P0105218  
Permit Type: Initial Installation  
County: Butler

Certified Mail

Yes	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR
No	CEMS
No	MACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of 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 comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, Journal News. A copy of the public notice and the draft permit are enclosed. This permit has been posted to the Division of Air Pollution Control Web page <http://www.epa.state.oh.us/dapc> in Microsoft Word and Adobe Acrobat format. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall  
Permit Review/Development Section  
Ohio EPA, DAPC  
122 South Front Street  
Columbus, Ohio 43215

and Hamilton County Dept. of Environmental Services  
250 William Howard Taft Pkwy.  
Cincinnati, OH 45219-2660

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install and operate will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install and Operate is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Hamilton County Dept. of Environmental Services at (513)946-7777.

Sincerely,

Michael W. Ahern, Manager  
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 *Via E-Mail Notification*  
HCDOES; Indiana; Kentucky





## Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

OPW Fueling Components (OPW) is a manufacturer of gasoline-dispensing nozzles and associated equipment located in Butler County, Ohio. OPW is proposing to install four new nozzle flow test lines (Lines A, B, C, and D, identified as emissions units P013, P014, P015, and P016). The nozzle flow test lines gauge the accuracy, quality, and performance of the manufactured dispensing nozzles by re-circulating stoddard solvent from a test tank through each nozzle dispenser. Regulated emissions from these test lines consist of volatile organic compounds (VOCs) from evaporated stoddard solvent during the flow test.

3. Facility Emissions and Attainment Status:

OPW is currently a minor source of VOC emissions. OPW has five existing nozzle test lines (emissions units P003, P004, P005, P006, and P008) operating under minor source permits that were issued final with a total combined permit allowable limit of 20.2 tons per year (TPY) of VOC and a potential to emit (PTE), assuming 8760 hours of operation per year, of 70.08 TPY of VOC. In this permit action, OPW is proposing to install four additional nozzle test lines. With the installation of these new sources, the facility-wide (taking into considering both the existing and new emissions units) PTE for VOC emissions, assuming 8760 hours of operation per year, will increase to (70.08 TPY from existing emissions units plus 56.06 TPY from the new emissions units) 126.14 TPY without any federally enforceable restrictions. OPW has requested federally enforceable restrictions in this permit action to limit the potential to emit of the new nozzle test lines, individually, to 3.33 TPY of VOC. This will establish a facility-wide potential to emit of (70.08 TPY from existing emissions units without restrictions plus 13.32 TPY from the new emissions units with restrictions) 83.40 TPY VOC.

The facility is located in Butler County which is currently non-attainment for 8-hour ozone standard (VOC and NOx), non-attainment for PM2.5, and attainment for all other criteria pollutants. The synthetic minor limitations ensure that the facility is not considered a major stationary source of VOC in an ozone non-attainment area for the purposes of New Source Review (NSR) activities and that the facility is not subject to Title V permitting requirements.

4. Source Emissions:

The federally enforceable VOC emission limitations in this synthetic minor permit action are as follows:

FEPTIO #P0105218:

Emissions unit P013:	3.33 TPY VOC, as a rolling 12-month summation
Emissions unit P014:	3.33 TPY VOC, as a rolling 12-month summation
Emissions unit P015:	3.33 TPY VOC, as a rolling 12-month summation
Emissions unit P016:	<u>3.33 TPY VOC, as a rolling 12-month summation</u>
Total	13.32 TPY VOC



State of Ohio Environmental Protection Agency  
 Division of Air Pollution Control

**Permit Strategy Write-Up**  
**Permit Number:** P0105218  
**Facility ID:** 1409000070

These limitations will establish a facility-wide potential to emit of 83.40 TPY of VOC, which includes existing sources already permitted under minor source permits.

5. Conclusion:

The permittee has proposed to comply with the federally enforceable emission limitations of 3.33 TPY VOC, individually for each new emissions unit in this permit action, as rolling 12-month summations; has proposed associated operational and emissions record keeping and reporting to demonstrate compliance with these limitations; and, will accept the terms and conditions of this permit which will limit emissions of VOC as a Synthetic Minor so that the facility will not trigger Title V permitting and major source status in a non-attainment area under NSR. The facility will maintain records and be subject to reporting as outlined in the permit to ensure compliance with the voluntary synthetic minor emission limitations.

6. Please provide additional notes or comments as necessary:

None

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	13.32

PUBLIC NOTICE  
Issuance of Draft Air Pollution Permit-To-Install and Operate  
OPW FUELING COMPONENTS

Issue Date: 9/22/2009  
Permit Number: P0105218  
Permit Type: Initial Installation  
Permit Description: Installation of New Nozzle Flow Test Line Tanks A, B, D, and D  
Facility ID: 1409000070  
Facility Location: OPW FUELING COMPONENTS  
9393 Princeton-Glendale Road,  
Hamilton, OH 45011  
Facility Description: Measuring and Dispensing Pump Manufacturing

Chris Korleski, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio has issued a draft action of an air pollution control, federally enforceable permit-to-install and operate (PTIO) for the facility at the location identified above on the date indicated. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Paul Tedtman at Hamilton County Dept. of Environmental Services, 250 William Howard Taft Pkwy. or (513)946-7777. The permit can be downloaded from the Web page: [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc)





State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**DRAFT**

**Air Pollution Permit-to-Install and Operate  
for  
OPW FUELING COMPONENTS**

Facility ID: 1409000070  
Permit Number: P0105218  
Permit Type: Initial Installation  
Issued: 9/22/2009  
Effective: To be entered upon final issuance  
Expiration: To be entered upon final issuance





State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Air Pollution Permit-to-Install and Operate**  
for  
**OPW FUELING COMPONENTS**

Table of Contents

- Authorization ..... 1
- A. Standard Terms and Conditions ..... 3
  - 1. What does this permit-to-install and operate ("PTIO") allow me to do?..... 4
  - 2. Who is responsible for complying with this permit? ..... 4
  - 3. What records must I keep under this permit? ..... 4
  - 4. What are my permit fees and when do I pay them?..... 4
  - 5. When does my PTIO expire, and when do I need to submit my renewal application? ..... 4
  - 6. What happens to this permit if my project is delayed or I do not install or modify my source? ..... 5
  - 7. What reports must I submit under this permit? ..... 5
  - 8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit? ..... 5
  - 9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?... 5
  - 10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report? ..... 6
  - 11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located? ..... 6
  - 12. What happens if one or more emissions units operated under this permit is/are shut down permanently? ..... 6
  - 13. Can I transfer this permit to a new owner or operator? ..... 6
  - 14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"? ..... 7
  - 15. What happens if a portion of this permit is determined to be invalid? ..... 7
- B. Facility-Wide Terms and Conditions ..... 8
- C. Emissions Unit Terms and Conditions ..... 10
  - 1. Emissions Unit Group - Nozzle Test Lines A, B, C, D: P013, P014, P015, P016 ..... 11





State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install and Operate**

**Permit Number:** P0105218

**Facility ID:** 1409000070

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

# Authorization

Facility ID: 1409000070  
Application Number(s): A0038029  
Permit Number: P0105218  
Permit Description: Installation of New Nozzle Flow Test Line Tanks A, B, D, and D  
Permit Type: Initial Installation  
Permit Fee: \$800.00 *DO NOT send payment at this time - subject to change before final issuance*  
Issue Date: 9/22/2009  
Effective Date: To be entered upon final issuance  
Expiration Date: To be entered upon final issuance  
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

OPW FUELING COMPONENTS  
9393 Princeton-Glendale Road  
Hamilton, OH 45011

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Hamilton County Dept. of Environmental Services  
250 William Howard Taft Pkwy.  
Cincinnati, OH 45219-2660  
(513)946-7777

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section 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 described emissions unit(s) will operate in compliance with applicable State and Federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski  
Director



State of Ohio Environmental Protection Agency  
 Division of Air Pollution Control

**Draft Permit-to-Install and Operate**

**Permit Number:** P0105218

**Facility ID:** 1409000070

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

## Authorization (continued)

Permit Number: P0105218

Permit Description: Installation of New Nozzle Flow Test Line Tanks A, B, D, and D

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

**Group Name:** Nozzle Test Lines A, B, C, D

<b>Emissions Unit ID:</b>	<b>P013</b>
Company Equipment ID:	Test Tank A
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P014</b>
Company Equipment ID:	Test Tank B
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P015</b>
Company Equipment ID:	Test Tank C
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P016</b>
Company Equipment ID:	Test Tank D
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install and Operate**

**Permit Number:** P0105218

**Facility ID:** 1409000070

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

## **A. Standard Terms and Conditions**



**1. What does this permit-to-install and operate ("PTIO") allow me to do?**

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

**2. Who is responsible for complying with this permit?**

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

**3. What records must I keep under this permit?**

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

**4. What are my permit fees and when do I pay them?**

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

**5. When does my PTIO expire, and when do I need to submit my renewal application?**

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is



very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

**6. What happens to this permit if my project is delayed or I do not install or modify my source?**

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

**7. What reports must I submit under this permit?**

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

**8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?**

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

**9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?**

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.



**10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?**

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Hamilton County Dept. of Environmental Services in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

**11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?**

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

**12. What happens if one or more emissions units operated under this permit is/are shut down permanently?**

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

**13. Can I transfer this permit to a new owner or operator?**

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install and Operate**

**Permit Number:** P0105218

**Facility ID:** 1409000070

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

**14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?**

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

**15. What happens if a portion of this permit is determined to be invalid?**

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install and Operate**

**Permit Number:** P0105218

**Facility ID:** 1409000070

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

## **B. Facility-Wide Terms and Conditions**



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install and Operate**

**Permit Number:** P0105218

**Facility ID:** 1409000070

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

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - (1) None.
  - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - (1) None.



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install and Operate**

**Permit Number:** P0105218

**Facility ID:** 1409000070

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

## **C. Emissions Unit Terms and Conditions**



**1. Emissions Unit Group - Nozzle Test Lines A, B, C, D: P013, P014, P015, P016**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
P013	Nozzle Flow Test Tank A
P014	Nozzle Flow Test Tank B
P015	Nozzle Flow Test Tank C
P016	Nozzle Flow Test Tank D

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. d)(2), d)(3), d)(4), d)(5), and e)(1)a.iii.
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. b)(1)a., b)(2)a.i., b)(2)a.ii., c)(1), d)(1), e)(1)a.i., e)(1)a.ii., f)(1), and f)(2).
- b) **Applicable Emissions Limitations and/or Control Requirements**
  - (1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	<b>Applicable Rules/Requirements</b>	<b>Applicable Emissions Limitations/Control Measures</b>
a.	OAC rule 3745-31-05(D)  Voluntary Restriction to Avoid Best Available Technology (BAT) and Synthetic Minor to avoid Title V Permitting	Volatile organic compound (VOC) emissions shall not exceed 3.33 tons per year (TPY), as a rolling 12-month summation.  See b)(2)a. and c)(1).

- (2) **Additional Terms and Conditions**
  - a. Federally Enforceable Permit to Install and Operate (FEPTIO) P0105218 for this air contaminant source takes into account the following voluntary restrictions as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):
    - i. Limiting the annual VOC emissions to 3.33 TPY, as a rolling 12-month summation;
    - ii. Limiting the maximum annual amount of solvent evaporated to 812 gallons per year, as a rolling, 12-month summation; and



- iii. Limiting the maximum VOC content of the solvent employed to 8.2 pounds per gallon.

c) Operational Restrictions

- (1) The maximum annual amount of solvent evaporated in each emissions unit shall not exceed 812 gallons per year as a rolling 12-month summation. The amount of solvent evaporated shall be determined by taking the number of gallons of solvent employed and subtracting the number of gallons of solvent reclaimed (see record keeping requirements in terms and conditions d)(1).

The permittee has existing records to demonstrate compliance with this restriction upon permit issuance.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee maintain monthly records of the following information for each emissions unit:
  - a. The company identification of each solvent employed;
  - b. The number of gallons of each solvent employed;
  - c. The number of gallons of each solvent reclaimed;
  - d. The VOC content of each solvent employed, in pounds per gallon;
  - e. The total amount of solvent evaporated [summation of (b. – c.) for each solvent], in gallons;
  - f. The updated rolling, 12-month summation of the total amount of solvent evaporated, in gallons. This shall include the information for the current month and the preceding eleven calendar months;
  - g. The total VOC emissions [summation of (b. - c.) x d. for each solvent], in pounds; and
  - h. The updated rolling, 12-month summation of the total VOC emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
- (2) The FEPTIO application for these emission units, P013, P014, P015, and P016, was evaluated based on the actual materials and the design parameters of the emissions units' exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to these emission units for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:



- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
  - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
  - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "10" hours per day and "4" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Toxic Contaminant: Stoddard solvent

TLV (mg/m3): 572.59

Maximum Hourly Emission Rate (lbs/hr): 12.8

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 211.5

MAGLC (ug/m3): 13,633

The permittee has demonstrated that emissions of stoddard solvent from emission units P013, P014, P015, and P016, combined, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

- (3) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration", the permittee shall re-model the



change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
- c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final FEPTIO prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

- (4) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):
  - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
  - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);
  - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
  - d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.



- (5) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
  - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
    - i. all exceedances of the rolling, 12-month limitation on the amount of solvent evaporated;
    - ii. all exceedances of the rolling, 12-month VOC emissions limitation; and
    - iii. any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration; or if no changes to the emissions, emissions unit(s), or the exhaust stack have been made, a statement to this effect.
  - b. the probable cause of each deviation (excursion);
  - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
  - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1) and b)(2) shall be determined in accordance with the following methods:



a. Emissions Limitation:

Volatile organic compound (VOC) emissions shall not exceed 3.33 tons per year (TPY), based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month VOC emissions limitation in b)(1)a. shall be determined by the record keeping in d)(1).

The annual VOC emissions limitation established through OAC rule 3745-31-05(D) was developed from the following equations using the information supplied by the permittee in FEPTIO application A0038029, submitted on July 20, 2009:

3.2 pounds per hour maximum solvent evaporation rate from permittee-supplied engineering estimates x maximum 2,080 operating hours per year per tank = 6,656 pounds of solvent evaporated per year;

6,656 pounds of solvent evaporated x 1 gallon/8.2 pounds per gallon solvent density = 812 gallons of solvent evaporated per year; and

812 gallons of solvent evaporated per year x maximum VOC content of 8.2 pounds of VOC/gallon of solvent x 1 ton/2000 pounds = 3.33 TPY of VOC.

US EPA Method 24 or formulation data shall be used to determine the VOC content of the solvents employed.

(2) Compliance with the rolling, 12-month solvent evaporation restriction in c)(1) shall be determined by the record keeping in d)(1).

g) Miscellaneous Requirements

(1) None.