



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

06/20/01

CERTIFIED MAIL

**RE: Final Title V Chapter 3745-77
permit**

14-09-01-0001
Aeronca, Inc.
Leah Spears
1712 Germantown Road
Middletown, OH 45042

Dear Leah Spears:

Enclosed is the Title V permit that allows you to operate the facility in the manner indicated in the permit. Because this permit may contain several conditions and restrictions, we urge you to read it carefully.

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but 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.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street
Room 300
Columbus, Ohio 43215

If you have any questions, please contact Hamilton County Dept. of Environmental Services.

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: Hamilton County Dept. of Environmental Services
File, DAPC PMU



State of Ohio Environmental Protection Agency

FINAL TITLE V PERMIT

Issue Date: 06/20/01	Effective Date: 06/20/01	Expiration Date: 06/20/06
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This document constitutes issuance of a Title V permit for Facility ID: 14-09-01-0001 to:

Aeronca, Inc.
1712 Germantown Road
Middletown, OH 45042

Emissions Unit ID (Company ID)/Emissions Unit Activity Description

K003 (Dept. 9 Booth 6)
Department 9 paint spray booth 6.

K004 (Dept. 9 Booth 5)
Department 9 paint spray booth 5.

K007 (Dept. 9 Booth 7)
Department 9 paint spray booth 7.

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-04(A) and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

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

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

PART I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Section

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. 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 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.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. These quarterly written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations except malfunctions, which shall be reported in accordance with OAC rule 3745-15-06. The written 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.) See B.8 below if no deviations occurred during the quarter.
 - iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31

and July 31 of each year for the previous six calendar months. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the reporting of any deviations related to the monitoring, recordkeeping, and reporting requirements. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. 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, i.e., upset, 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. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports submitted pursuant to OAC rule 3745-15-06 shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of deviations caused by malfunctions or upsets.

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 emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is

grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. 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 request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. 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.

8. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

9. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these general terms and conditions shall apply to all operating scenarios authorized in this permit.

10. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

- a. Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b. This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c. The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d. The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

11. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

12. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.

- iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
- d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the appropriate Ohio EPA District Office or local air agency in the following manner and with the following content:
- i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
 - ii. Compliance certifications shall include the following:
 - (a) An identification of each term or condition of this permit that is the basis of the certification.
 - (b) The permittee's current compliance status.
 - (c) Whether compliance was continuous or intermittent.
 - (d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.
 - (e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
 - iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

13. Permit Shield

- a. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.
- b. This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

14. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

15. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

16. Off Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

- a. The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition;
- b. The permittee provides contemporaneous written notice of the change to the director and the administrator, except that no such notice shall be required for changes that qualify as insignificant emission levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change;
- c. The change shall not qualify for the permit shield under OAC rule 3745-77-07(F);
- d. The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes; and
- e. The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit to install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(For further clarification, the permittee can refer to Engineering Guide #63 that is available in their STARSHIP software package.)

17. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.

18. Insignificant Activity

Each insignificant activity that has one or more applicable requirements shall comply with those applicable requirements.

B. State Only Enforceable Section

1. Permit to Install Requirement

Prior to the “installation” or “modification” of any “air contaminant source,” as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

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. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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.

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforcable Section

None

B. State Only Enforceable Section

1. The following insignificant emissions unit(s) are located at this facility:

B001 Four Gas-Fired Boilers - 103171, 103174, 109600, 12819
B005 Kewanee Gas/Oil-Fired Boilers - 119451, 119452, 119453
B013 8.37 MBTU/HR Kewanee Gas/Oil-Fired Boiler No. 190957
B014 8.37 MBTU/HR Kewanee Gas/Oil-Fired Boiler No. 190958
B015 8.37 MBTU/HR Kewanee Gas/Oil-Fired Boiler No. 190959
B016 8.37 MBTU/HR Kewanee Gas/Oil-Fired Boiler No. 190960
P002 Vacu-Blast Glass Bead Peener - 11328
P003 Vacu-Blast Cleaner - 11510
P004 M and T Chemical Co. Anodizer - 12842
P009 Despatch Curing Oven M-11385
Z001 Braze Cleaning Line (1B)
Z002 Chemical (alodine) Cleaning Line (1)
Z003 Dilute Chrome Seal (oth) Replaced Sulfuric Acid (P004)

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within a permit to install for the emissions unit.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Dept. 9 Booth 6 (K003)
Activity Description: Department 9 paint spray booth 6.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
Spray Booth #6, Department 9	40 CFR Part 63 Subpart GG	See Terms A.I.2.b thru n.
	OAC rule 3745-21-07(G)(2)	On days when non-metal parts are coated and photochemically reactive materials are employed, organic compound (OC) emissions shall not exceed 8 pounds per hour and 40 pounds per day from coating non-metal parts.
	OAC rule 3745-21-09(U)(2)(e)(ii)	See Term A.I.2.a.
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
	OAC rule 3745-17-11	0.551 lb particulate emissions (PE)/hr

2. Additional Terms and Conditions

- 2.a The maximum daily coating use for this emissions unit for the coating of metal parts shall not exceed 3 gallons per day.*

*Although the requirements of OAC rule 3745-21-09(U) allow for an exemption from applicable VOC content limitations, the daily usage exemption allowed in accordance with OAC rule 3745-21-09(U)(2)(e)(ii) is not part of the federally approved SIP (for the Cincinnati ozone area). The rule has been revised by the Ohio EPA to specify an exemption level (3 gallons per day) that will be acceptable to USEPA. The Ohio EPA has received confirmation from the USEPA of the acceptability of the lower exemption level; therefore, the 3 gallons per day usage restriction will serve as the exemption level while SIP approval by USEPA is being obtained.

2. Additional Terms and Conditions (continued)

- 2.b** The permittee shall comply with the requirements below unless the solvent used is classified as a cleaning solvent that contains no organic HAP or VOC as identified in 40 CFR 63.744(b)(1) or the cleaning solvent contains HAP or VOC at a concentration less than 0.1% for carcinogens or 1.0% for non-carcinogens, as determined from manufacturer's representations:
- i. Place cleaning solvent-laden cloth, paper, or any other absorbent applicators used for cleaning in bags or other closed containers upon completing their use. Ensure that these bags and containers are kept closed at all times except when depositing or removing these materials from the container. Use bags and containers of such design so as to contain the vapors of the cleaning solvent. Cotton-tipped swabs used for very small cleaning operations are exempt from this requirement.
 - ii. Store fresh and spent cleaning solvents, except semi-aqueous solvent cleaners, used in aerospace cleaning operations in closed containers.
 - iii. Conduct the handling and transfer of cleaning solvents to or from enclosed systems, vats, waste containers, and other cleaning operation equipment that hold or store fresh or spent cleaning solvents in such a manner that minimizes spills.
- 2.c** The permittee shall use cleaning solvents for hand-wipe cleaning operations that meet one of the requirements specified below (cleaning solvent containing HAP or VOC at a concentration less than 0.1% for carcinogens or 1.0% for non-carcinogens, as determined from manufacturer's representations, are exempt from these requirements):
- i. Meet one of the composition requirements in 40 CFR 63.744(b)(1).
 - ii. Have a composite vapor pressure of 45 mm Hg (24.1 in. H₂O) or less at 20 deg. C (68 deg. F).
- 2.d** Except as provided for in 40 CFR 63.744(c)(1)(e), the permittee shall use one or more of the techniques, or their equivalent, specified below to clean spray guns. Spray gun cleaning operations using cleaning solvent solutions that contain HAP or VOC at a concentration less than 0.1% for carcinogens or 1.0% for non-carcinogens, as determined from manufacturer's representations, are exempt from these requirements. Cleaning of the nozzle tips of automated spray equipment systems, except for robotic systems that can be programmed to spray into a closed container, shall be exempt from these requirements.
- i. Enclosed system - The permittee shall clean the spray gun in an enclosed system that is closed at all times except when inserting or removing the spray gun. Cleaning shall consist of forcing solvent through the gun. If leaks are found during the monthly inspection, repairs shall be made as soon as practicable, but no later than 15 days after the leak was found. If the leak is not repaired by the 15th day after detection, the cleaning solvent shall be removed and the enclosed cleaner shall be shut down until the leak is repaired or its use is permanently discontinued.
 - ii. Nonatomized cleaning - The permittee shall clean the spray gun by placing cleaning solvent in the pressure pot and forcing it through the gun with the atomizing cap in place. No atomizing air is to be used. The permittee shall direct the cleaning solvent from the spray gun into a vat, drum, or other waste container that is closed when not in use.
 - iii. Disassembled spray gun cleaning - The permittee shall disassemble the spray gun and clean the components by hand in a vat, which shall remain closed at all times except when in use. Alternatively, the permittee shall soak the components in a vat, which shall remain closed during the soaking period and when not inserting or removing components.
 - iv. Atomizing cleaning - The permittee shall clean the spray gun by forcing the cleaning solvent through the gun and direct the resulting atomized spray into a waste container that is fitted with a device designed to capture the atomized cleaning solvent emissions.

2. Additional Terms and Conditions (continued)

- 2.e** The requirements of terms A.I.2.h thru m do not apply to the use of specialty coatings (as defined in 63.742), adhesives, adhesive bonding primers, or sealants at aerospace facilities. The requirements of terms A.I.2.d thru i also do not apply to primers, topcoats, and cleaning solvents containing HAP or VOC at a concentration less than 0.1% for carcinogens or 1.0% for non-carcinogens, as determined from manufacturer's representations.
- 2.f** The requirements of terms A.I.2.h thru m do not apply to the use of low-volume coatings for which the annual total of each separate formulation used at the facility does not exceed 50 gallons, and the combined annual total of all such primers, topcoats, and chemical milling maskants used at the facility does not exceed 200 gallons. Primers and topcoats exempted under A.I.2.k are not included in the 50 gallons and 200 gallons limits.
- 2.g** The requirements of terms A.I.2.k thru m do not apply to the following:
- i. touch-up of scratched surfaces or damaged paint;
 - ii. hole daubing for fasteners;
 - iii. touch-up of trimmed edges;
 - iv. coating prior to joining dissimilar metal components;
 - v. stencil operations performed by brush or air brush;
 - vi. section joining;
 - vii. touch-up of bushings and other similar parts;
 - viii. sealant detackifying; and
 - ix. painting parts in an area identified in a Title V permit, where the permitting authority has determined that it is not technically feasible to paint the parts in a booth.
- 2.h** The permittee shall conduct the handling and transfer of primers and topcoats to or from containers, tanks, vats, vessels and piping systems in such a manner that minimizes spills.
- 2.i** The permittee shall comply with the organic HAP and VOC content limits specified below:
- i. Organic HAP emissions from primers shall be limited to an organic HAP content level of no more than 350 g/l (2.9 lb/gal) of primer (less water) as applied.
 - ii. VOC emissions from primers shall be limited to a VOC content level of no more than 350 g/l (2.9 lb/gal) of primer (less water and exempt solvents) as applied.
 - iii. Organic HAP emissions from topcoats shall be limited to an organic HAP content level of no more than 420 g/l (3.5 lb/gal) of coating (less water) as applied. Organic HAP emissions from self-priming topcoats shall be limited to an organic HAP content level of no more than 420 g/l (3.5 lb/gal) of self-priming topcoat (less water) as applied.
 - iv. VOC emissions from topcoats shall be limited to a VOC content level of no more than 420 g/l (3.5 lb/gal) of coating (less water and exempt solvents) as applied. VOC emissions from self-priming topcoats shall be limited to a VOC content level of no more than 420 g/l (3.5 lb/gal) of self-priming topcoat (less water and exempt solvents) as applied.
- 2.j** Except as provided for in 40 CFR 63.745(f)(3), the permittee shall use a high volume low pressure (HVLP) spraying technique for the application of all primers and topcoats.
- 2.k** The permittee shall apply coatings that contain inorganic HAP in a booth or hangar in which air flow is directed downward onto or across the part or assembly being coated and exhausted through one or more outlets.
- 2.l** The permittee shall control air stream from this operation by passing the air stream through a water wash system that shall remain in operation during all coating application operations before exhausting it to the atmosphere.

2. Additional Terms and Conditions (continued)

- 2.m** If the water path in the water wash system fails the visual continuity / flow characteristics check, or the water flow rate recorded exceeds the limit(s) specified by the booth manufacturer or in locally prepared operating procedures, or the booth manufacturer's or locally prepared maintenance procedures for the water wash system have not been performed as scheduled, shutdown the operation immediately and take corrective action. The operation shall not be resumed until the water flow rate is returned within the specified limit(s).
- 2.n** The permittee shall conduct the handling and transfer of the waste that contains HAP to or from containers, tanks, vats, vessels, and piping systems in such a manner that minimizes spills.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. Enclosed Spray Gun Cleaners - If the permittee employs an enclosed spray gun cleaner, the permittee shall visually inspect the seals and all other potential sources of leaks associated with each enclosed gun spray cleaner system at least once per month. Each inspection shall occur while the system is in operation.
2. The permittee shall maintain the following information for the cleaning operations, as appropriate:
 - a. The name, vapor pressure, and documentation showing the organic HAP constituents of each cleaning solvent used for affected cleaning operations at the facility.
 - b. For each cleaning solvent used in hand-wipe cleaning operations that complies with the composition requirements specified in 40 CFR 63.744(b)(1):
 - i. The name of each cleaning solvent used.
 - ii. All data and calculations that demonstrate that the cleaning solvent complies with one of the composition requirements.
 - iii. Annual records of the volume of each solvent used, as determined from facility purchase records or usage records.
 - c. For each cleaning solvent used in hand-wipe cleaning operations that does not comply with the composition requirements in 40 CFR 63.744(b)(1), but does comply with the vapor pressure requirement in A.1.2.c:
 - i. The name of each cleaning solvent used.
 - ii. The composite vapor pressure of each cleaning solvent used.
 - iii. All vapor pressure test results, if appropriate, data, and calculations used to determine the composite vapor pressure of each cleaning solvent.
 - iv. The amount (in gallons) of each cleaning solvent used each month at each operation.
 - d. A record of all leaks from enclosed spray gun cleaners identified during the inspections that includes for each leak found:
 - i. Source identification.
 - ii. Date leak was discovered.
 - iii. Date leak was repaired.
3. The permittee shall maintain the following information for the prime coat and topcoat application operations, as appropriate:
 - a. The name and VOC content as received and as applied of each primer and topcoat used at the facility.
 - b. The mass of organic HAP emitted per unit volume of coating as applied (less water) (H) and the mass of VOC emitted per unit volume of coating as applied (less water and exempt solvents) (G) for each coating formulation within each coating category used each month.
 - c. All data, calculations, and test results (including EPA Method 24 results) used in determining the values of H and G above.
 - d. The volume (gal) of each coating formulation within each coating category used each month.

III. Monitoring and/or Record Keeping Requirements (continued)

4. If a conventional water wash system is used, the permittee shall continuously monitor the water flow rate through the operating system and read and record the water flow rate once each shift during which coating operations occur. If a pumpless water wash system is used, the permittee shall continuously monitor the parameter(s) that indicate performance of the booth (per the manufacturer's recommendations to maintain the booth within the acceptable operating efficiency range) and read and record these parameter(s) once each shift during which coating operations occur. This log shall include the acceptable limit(s) of water flow rate, or for the pumpless water wash booth, the booth manufacturer recommended parameter(s) that indicate the booth performance, as applicable, as specified by the booth manufacturer or in locally-prepared operating procedures.
5. The permittee shall collect and record the following information each day when metal parts are coated:
 - a. The name and identification number of each coating employed.
 - b. The volume, in gallons, of each coating employed.
 - c. The total volume, in gallons, of all of the coatings employed.
6. The permittee shall collect and record the following information when non-metal parts are coated and any photochemically reactive materials (coatings or cleanup materials) are employed:
 - a. The company identification for each coating and photochemically reactive cleanup material employed.
 - b. The number of gallons of each coating and photochemically reactive cleanup material employed.
 - c. The organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon.
 - d. The total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day.
 - e. The total number of hours the emissions unit was in operation.
 - f. The average hourly organic compound emission rate for all coatings and photochemically reactive cleanup materials, i.e., (d)/(e), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

IV. Reporting Requirements

1. The permittee shall submit semi-annual reports occurring every 6 months from the date of the notification of compliance status that identify:
 - a. Any instance where a non-compliant cleaning solvent is used for a hand-wipe cleaning operation.
 - b. A list of any new cleaning solvents used for hand-wipe cleaning in the previous 6 months and, as appropriate, their composite vapor pressure or notification that they comply with the composition requirements specified in 40 CFR 63.744(b)(1).
 - c. Any instance where a non-compliant spray gun cleaning method is used.
 - d. Any instance where a leaking enclosed spray gun cleaner remains unrepaired and in use for more than 15 days.
 - e. If the operations have been in compliance for the semi-annual period, a statement that the cleaning operations have been in compliance with the applicable standards. Sources shall also submit a statement of compliance signed by a responsible company official certifying that the facility is in compliance with all applicable requirements.

IV. Reporting Requirements (continued)

2. The permittee shall submit semi-annual reports occurring every 6 months from the date of the notification of compliance status that identify:
 - a. Each value of H and G recorded above in accordance with term A.III.3 that exceeds the applicable organic HAP or VOC content limit.
 - b. All times when a primer or topcoat application operation was not immediately shut down when the water flow rate through a conventional water wash system, or the recommended parameter(s) that indicate the booth performance for pumpless systems, as appropriate, was outside the limit(s) specified by the booth manufacturer or in locally-prepared operating procedures.
 - c. If the operations have been in compliance for the semi-annual period, a statement that the operations have been in compliance with the applicable standards.
3. The permittee shall submit annual reports occurring every 12 months from the date of the notification of compliance status that identify the number of times the water flow rate for the water wash system was outside the limit(s) specified by the booth manufacturer or in locally prepared operating procedures.
4. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit for coating metal parts in term A.1.2.a. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
5. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials employed for coating non-metal parts exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day.
 - b. An identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials employed for coating non-metal parts exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

V. Testing Requirements

1. Compliance with the hourly organic compound emission limit for coating non-metal parts shall be based upon the record keeping requirements contained in Section A.III.6 of this permit.
2. Compliance with the daily organic compound emission limit for coating non-metal parts shall be based upon the record keeping requirements contained in Section A.III.6 of this permit.
3. Compliance with HAP, VOC content, and other formulation requirements shall be determined by methods specified in 40 CFR 63.750 and information collected and recorded in Section A.III of this permit.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
Spray Booth #6, Department 9		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Dept. 9 Booth 5 (K004)
Activity Description: Department 9 paint spray booth 5.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
Spray Booth #5, Department 9	40 CFR Part 63 Subpart GG	See Terms A.I.2.b thru n.
	OAC rule 3745-21-07(G)(2)	On days when non-metal parts are coated and photochemically reactive materials are employed, organic compound (OC) emissions shall not exceed 8 pounds per hour and 40 pounds per day from coating non-metal parts.
	OAC rule 3745-21-09(U)(2)(e)(ii)	See Term A.I.2.a.
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
	OAC rule 3745-17-11	0.551 lb particulate emissions (PE)/hr

2. Additional Terms and Conditions

- 2.a The maximum daily coating use for this emissions unit for the coating of metal parts shall not exceed 3 gallons per day.*

*Although the requirements of OAC rule 3745-21-09(U) allow for an exemption from applicable VOC content limitations, the daily usage exemption allowed in accordance with OAC rule 3745-21-09(U)(2)(e)(ii) is not part of the federally approved SIP (for the Cincinnati ozone area). The rule has been revised by the Ohio EPA to specify an exemption level (3 gallons per day) that will be acceptable to USEPA. The Ohio EPA has received confirmation from the USEPA of the acceptability of the lower exemption level; therefore, the 3 gallons per day usage restriction will serve as the exemption level while SIP approval by USEPA is being obtained.

2. Additional Terms and Conditions (continued)

- 2.b** The permittee shall comply with the requirements below unless the solvent used is classified as a cleaning solvent that contains no organic HAP or VOC as identified in 40 CFR 63.744(b)(1) or the cleaning solvent contains HAP or VOC at a concentration less than 0.1% for carcinogens or 1.0% for non-carcinogens, as determined from manufacturer's representations:
- i. Place cleaning solvent-laden cloth, paper, or any other absorbent applicators used for cleaning in bags or other closed containers upon completing their use. Ensure that these bags and containers are kept closed at all times except when depositing or removing these materials from the container. Use bags and containers of such design so as to contain the vapors of the cleaning solvent. Cotton-tipped swabs used for very small cleaning operations are exempt from this requirement.
 - ii. Store fresh and spent cleaning solvents, except semi-aqueous solvent cleaners, used in aerospace cleaning operations in closed containers.
 - iii. Conduct the handling and transfer of cleaning solvents to or from enclosed systems, vats, waste containers, and other cleaning operation equipment that hold or store fresh or spent cleaning solvents in such a manner that minimizes spills.
- 2.c** The permittee shall use cleaning solvents for hand-wipe cleaning operations that meet one of the requirements specified below (cleaning solvent containing HAP or VOC at a concentration less than 0.1% for carcinogens or 1.0% for non-carcinogens, as determined from manufacturer's representations, are exempt from these requirements):
- i. Meet one of the composition requirements in 40 CFR 63.744(b)(1).
 - ii. Have a composite vapor pressure of 45 mm Hg (24.1 in. H₂O) or less at 20 deg. C (68 deg. F).
- 2.d** Except as provided for in 40 CFR 63.744(c)(1)(e), the permittee shall use one or more of the techniques, or their equivalent, specified below to clean spray guns. Spray gun cleaning operations using cleaning solvent solutions that contain HAP or VOC at a concentration less than 0.1% for carcinogens or 1.0% for non-carcinogens, as determined from manufacturer's representations, are exempt from these requirements. Cleaning of the nozzle tips of automated spray equipment systems, except for robotic systems that can be programmed to spray into a closed container, shall be exempt from these requirements.
- i. Enclosed system - The permittee shall clean the spray gun in an enclosed system that is closed at all times except when inserting or removing the spray gun. Cleaning shall consist of forcing solvent through the gun. If leaks are found during the monthly inspection, repairs shall be made as soon as practicable, but no later than 15 days after the leak was found. If the leak is not repaired by the 15th day after detection, the cleaning solvent shall be removed and the enclosed cleaner shall be shut down until the leak is repaired or its use is permanently discontinued.
 - ii. Nonatomized cleaning - The permittee shall clean the spray gun by placing cleaning solvent in the pressure pot and forcing it through the gun with the atomizing cap in place. No atomizing air is to be used. The permittee shall direct the cleaning solvent from the spray gun into a vat, drum, or other waste container that is closed when not in use.
 - iii. Disassembled spray gun cleaning - The permittee shall disassemble the spray gun and clean the components by hand in a vat, which shall remain closed at all times except when in use. Alternatively, the permittee shall soak the components in a vat, which shall remain closed during the soaking period and when not inserting or removing components.
 - iv. Atomizing cleaning - The permittee shall clean the spray gun by forcing the cleaning solvent through the gun and direct the resulting atomized spray into a waste container that is fitted with a device designed to capture the atomized cleaning solvent emissions.

2. Additional Terms and Conditions (continued)

- 2.e** The requirements of terms A.I.2.h thru m do not apply to the use of specialty coatings (as defined in 63.742), adhesives, adhesive bonding primers, or sealants at aerospace facilities. The requirements of terms A.I.2.d thru i also do not apply to primers, topcoats, and cleaning solvents containing HAP or VOC at a concentration less than 0.1% for carcinogens or 1.0% for non-carcinogens, as determined from manufacturer's representations.
- 2.f** The requirements of terms A.I.2.h thru m do not apply to the use of low-volume coatings for which the annual total of each separate formulation used at the facility does not exceed 50 gallons, and the combined annual total of all such primers, topcoats, and chemical milling maskants used at the facility does not exceed 200 gallons. Primers and topcoats exempted under A.I.2.k are not included in the 50 gallons and 200 gallons limits.
- 2.g** The requirements of terms A.I.2.k thru m do not apply to the following:
- i. touch-up of scratched surfaces or damaged paint;
 - ii. hole daubing for fasteners;
 - iii. touch-up of trimmed edges;
 - iv. coating prior to joining dissimilar metal components;
 - v. stencil operations performed by brush or air brush;
 - vi. section joining;
 - vii. touch-up of bushings and other similar parts;
 - viii. sealant detackifying; and
 - ix. painting parts in an area identified in a Title V permit, where the permitting authority has determined that it is not technically feasible to paint the parts in a booth.
- 2.h** The permittee shall conduct the handling and transfer of primers and topcoats to or from containers, tanks, vats, vessels and piping systems in such a manner that minimizes spills.
- 2.i** The permittee shall comply with the organic HAP and VOC content limits specified below:
- i. Organic HAP emissions from primers shall be limited to an organic HAP content level of no more than 350 g/l (2.9 lb/gal) of primer (less water) as applied.
 - ii. VOC emissions from primers shall be limited to a VOC content level of no more than 350 g/l (2.9 lb/gal) of primer (less water and exempt solvents) as applied.
 - iii. Organic HAP emissions from topcoats shall be limited to an organic HAP content level of no more than 420 g/l (3.5 lb/gal) of coating (less water) as applied. Organic HAP emissions from self-priming topcoats shall be limited to an organic HAP content level of no more than 420 g/l (3.5 lb/gal) of self-priming topcoat (less water) as applied.
 - iv. VOC emissions from topcoats shall be limited to a VOC content level of no more than 420 g/l (3.5 lb/gal) of coating (less water and exempt solvents) as applied. VOC emissions from self-priming topcoats shall be limited to a VOC content level of no more than 420 g/l (3.5 lb/gal) of self-priming topcoat (less water and exempt solvents) as applied.
- 2.j** Except as provided for in 40 CFR 63.745(f)(3), the permittee shall use a high volume low pressure (HVLP) spraying technique for the application of all primers and topcoats.
- 2.k** The permittee shall apply coatings that contain inorganic HAP in a booth or hangar in which air flow is directed downward onto or across the part or assembly being coated and exhausted through one or more outlets.
- 2.l** The permittee shall control air stream from this operation by passing the air stream through a water wash system that shall remain in operation during all coating application operations before exhausting it to the atmosphere.

2. Additional Terms and Conditions (continued)

- 2.m** If the water path in the water wash system fails the visual continuity / flow characteristics check, or the water flow rate recorded exceeds the limit(s) specified by the booth manufacturer or in locally prepared operating procedures, or the booth manufacturer's or locally prepared maintenance procedures for the water wash system have not been performed as scheduled, shutdown the operation immediately and take corrective action. The operation shall not be resumed until the water flow rate is returned within the specified limit(s).
- 2.n** The permittee shall conduct the handling and transfer of the waste that contains HAP to or from containers, tanks, vats, vessels, and piping systems in such a manner that minimizes spills.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. Enclosed Spray Gun Cleaners - If the permittee employs an enclosed spray gun cleaner, the permittee shall visually inspect the seals and all other potential sources of leaks associated with each enclosed gun spray cleaner system at least once per month. Each inspection shall occur while the system is in operation.
2. The permittee shall maintain the following information for the cleaning operations, as appropriate:
 - a. The name, vapor pressure, and documentation showing the organic HAP constituents of each cleaning solvent used for affected cleaning operations at the facility.
 - b. For each cleaning solvent used in hand-wipe cleaning operations that complies with the composition requirements specified in 40 CFR 63.744(b)(1):
 - i. The name of each cleaning solvent used.
 - ii. All data and calculations that demonstrate that the cleaning solvent complies with one of the composition requirements.
 - iii. Annual records of the volume of each solvent used, as determined from facility purchase records or usage records.
 - c. For each cleaning solvent used in hand-wipe cleaning operations that does not comply with the composition requirements in 40 CFR 63.744(b)(1), but does comply with the vapor pressure requirement in A.1.2.c:
 - i. The name of each cleaning solvent used.
 - ii. The composite vapor pressure of each cleaning solvent used.
 - iii. All vapor pressure test results, if appropriate, data, and calculations used to determine the composite vapor pressure of each cleaning solvent.
 - iv. The amount (in gallons) of each cleaning solvent used each month at each operation.
 - d. A record of all leaks from enclosed spray gun cleaners identified during the inspections that includes for each leak found:
 - i. Source identification.
 - ii. Date leak was discovered.
 - iii. Date leak was repaired.
3. The permittee shall maintain the following information for the prime coat and topcoat application operations, as appropriate:
 - a. The name and VOC content as received and as applied of each primer and topcoat used at the facility.
 - b. The mass of organic HAP emitted per unit volume of coating as applied (less water) (H) and the mass of VOC emitted per unit volume of coating as applied (less water and exempt solvents) (G) for each coating formulation within each coating category used each month.
 - c. All data, calculations, and test results (including EPA Method 24 results) used in determining the values of H and G above.
 - d. The volume (gal) of each coating formulation within each coating category used each month.

III. Monitoring and/or Record Keeping Requirements (continued)

4. If a conventional water wash system is used, the permittee shall continuously monitor the water flow rate through the operating system and read and record the water flow rate once each shift during which coating operations occur. If a pumpless water wash system is used, the permittee shall continuously monitor the parameter(s) that indicate performance of the booth (per the manufacturer's recommendations to maintain the booth within the acceptable operating efficiency range) and read and record these parameter(s) once each shift during which coating operations occur. This log shall include the acceptable limit(s) of water flow rate, or for the pumpless water wash booth, the booth manufacturer recommended parameter(s) that indicate the booth performance, as applicable, as specified by the booth manufacturer or in locally-prepared operating procedures.
5. The permittee shall collect and record the following information each day when metal parts are coated:
 - a. The name and identification number of each coating employed.
 - b. The volume, in gallons, of each coating employed.
 - c. The total volume, in gallons, of all of the coatings employed.
6. The permittee shall collect and record the following information when non-metal parts are coated and any photochemically reactive materials (coatings or cleanup materials) are employed:
 - a. The company identification for each coating and photochemically reactive cleanup material employed.
 - b. The number of gallons of each coating and photochemically reactive cleanup material employed.
 - c. The organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon.
 - d. The total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day.
 - e. The total number of hours the emissions unit was in operation.
 - f. The average hourly organic compound emission rate for all coatings and photochemically reactive cleanup materials, i.e., (d)/(e), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

IV. Reporting Requirements

1. The permittee shall submit semi-annual reports occurring every 6 months from the date of the notification of compliance status that identify:
 - a. Any instance where a non-compliant cleaning solvent is used for a hand-wipe cleaning operation.
 - b. A list of any new cleaning solvents used for hand-wipe cleaning in the previous 6 months and, as appropriate, their composite vapor pressure or notification that they comply with the composition requirements specified in 40 CFR 63.744(b)(1).
 - c. Any instance where a non-compliant spray gun cleaning method is used.
 - d. Any instance where a leaking enclosed spray gun cleaner remains unrepaired and in use for more than 15 days.
 - e. If the operations have been in compliance for the semi-annual period, a statement that the cleaning operations have been in compliance with the applicable standards. Sources shall also submit a statement of compliance signed by a responsible company official certifying that the facility is in compliance with all applicable requirements.

IV. Reporting Requirements (continued)

2. The permittee shall submit semi-annual reports occurring every 6 months from the date of the notification of compliance status that identify:
 - a. Each value of H and G recorded above in accordance with term A.III.3 that exceeds the applicable organic HAP or VOC content limit.
 - b. All times when a primer or topcoat application operation was not immediately shut down when the water flow rate through a conventional water wash system, or the recommended parameter(s) that indicate the booth performance for pumpless systems, as appropriate, was outside the limit(s) specified by the booth manufacturer or in locally-prepared operating procedures.
 - c. If the operations have been in compliance for the semi-annual period, a statement that the operations have been in compliance with the applicable standards.
3. The permittee shall submit annual reports occurring every 12 months from the date of the notification of compliance status that identify the number of times the water flow rate for the water wash system was outside the limit(s) specified by the booth manufacturer or in locally prepared operating procedures.
4. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit for coating metal parts in term A.1.2.a. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
5. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials employed for coating non-metal parts exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day.
 - b. An identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials employed for coating non-metal parts exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

V. Testing Requirements

1. Compliance with the hourly organic compound emission limit for coating non-metal parts shall be based upon the record keeping requirements contained in Section A.III.6 of this permit.
2. Compliance with the daily organic compound emission limit for coating non-metal parts shall be based upon the record keeping requirements contained in Section A.III.6 of this permit.
3. Compliance with HAP, VOC content, and other formulation requirements shall be determined by methods specified in 40 CFR 63.750 and information collected and recorded in Section A.III of this permit.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
Spray Booth #5, Department 9		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Dept. 9 Booth 7 (K007)
Activity Description: Department 9 paint spray booth 7.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
Spray Booth #7, Department 9	40 CFR Part 63 Subpart GG	See Terms A.I.2.b thru n.
	OAC rule 3745-21-07(G)(2)	On days when non-metal parts are coated and photochemically reactive materials are employed, organic compound (OC) emissions shall not exceed 8 pounds per hour and 40 pounds per day from coating non-metal parts.
	OAC rule 3745-21-09(U)(1)	See Term A.I.2.a.
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
	OAC rule 3745-17-11	0.551 lb particulate emissions (PE)/hr

2. Additional Terms and Conditions

- 2.a The VOC content of all coatings employed for coating metal parts shall not exceed 3.5 pounds per gallon as applied, excluding water and exempt solvents.

2. Additional Terms and Conditions (continued)

- 2.b** The permittee shall comply with the requirements below unless the solvent used is classified as a cleaning solvent that contains no organic HAP or VOC as identified in 40 CFR 63.744(b)(1) or the cleaning solvent contains HAP or VOC at a concentration less than 0.1% for carcinogens or 1.0% for non-carcinogens, as determined from manufacturer's representations:
- i. Place cleaning solvent-laden cloth, paper, or any other absorbent applicators used for cleaning in bags or other closed containers upon completing their use. Ensure that these bags and containers are kept closed at all times except when depositing or removing these materials from the container. Use bags and containers of such design so as to contain the vapors of the cleaning solvent. Cotton-tipped swabs used for very small cleaning operations are exempt from this requirement.
 - ii. Store fresh and spent cleaning solvents, except semi-aqueous solvent cleaners, used in aerospace cleaning operations in closed containers.
 - iii. Conduct the handling and transfer of cleaning solvents to or from enclosed systems, vats, waste containers, and other cleaning operation equipment that hold or store fresh or spent cleaning solvents in such a manner that minimizes spills.
- 2.c** The permittee shall use cleaning solvents for hand-wipe cleaning operations that meet one of the requirements specified below (cleaning solvent containing HAP or VOC at a concentration less than 0.1% for carcinogens or 1.0% for non-carcinogens, as determined from manufacturer's representations, are exempt from these requirements):
- i. Meet one of the composition requirements in 40 CFR 63.744(b)(1).
 - ii. Have a composite vapor pressure of 45 mm Hg (24.1 in. H₂O) or less at 20 deg. C (68 deg. F).
- 2.d** Except as provided for in 40 CFR 63.744(c)(1)(e), the permittee shall use one or more of the techniques, or their equivalent, specified below to clean spray guns. Spray gun cleaning operations using cleaning solvent solutions that contain HAP or VOC at a concentration less than 0.1% for carcinogens or 1.0% for non-carcinogens, as determined from manufacturer's representations, are exempt from these requirements. Cleaning of the nozzle tips of automated spray equipment systems, except for robotic systems that can be programmed to spray into a closed container, shall be exempt from these requirements.
- i. Enclosed system - The permittee shall clean the spray gun in an enclosed system that is closed at all times except when inserting or removing the spray gun. Cleaning shall consist of forcing solvent through the gun. If leaks are found during the monthly inspection, repairs shall be made as soon as practicable, but no later than 15 days after the leak was found. If the leak is not repaired by the 15th day after detection, the cleaning solvent shall be removed and the enclosed cleaner shall be shut down until the leak is repaired or its use is permanently discontinued.
 - ii. Nonatomized cleaning - The permittee shall clean the spray gun by placing cleaning solvent in the pressure pot and forcing it through the gun with the atomizing cap in place. No atomizing air is to be used. The permittee shall direct the cleaning solvent from the spray gun into a vat, drum, or other waste container that is closed when not in use.
 - iii. Disassembled spray gun cleaning - The permittee shall disassemble the spray gun and clean the components by hand in a vat, which shall remain closed at all times except when in use. Alternatively, the permittee shall soak the components in a vat, which shall remain closed during the soaking period and when not inserting or removing components.
 - iv. Atomizing cleaning - The permittee shall clean the spray gun by forcing the cleaning solvent through the gun and direct the resulting atomized spray into a waste container that is fitted with a device designed to capture the atomized cleaning solvent emissions.

2. Additional Terms and Conditions (continued)

- 2.e** The requirements of terms A.I.2.h thru m do not apply to the use of specialty coatings (as defined in 63.742), adhesives, adhesive bonding primers, or sealants at aerospace facilities. The requirements of terms A.I.2.d thru i also do not apply to primers, topcoats, and cleaning solvents containing HAP or VOC at a concentration less than 0.1% for carcinogens or 1.0% for non-carcinogens, as determined from manufacturer's representations.
- 2.f** The requirements of terms A.I.2.h thru m do not apply to the use of low-volume coatings for which the annual total of each separate formulation used at the facility does not exceed 50 gallons, and the combined annual total of all such primers, topcoats, and chemical milling maskants used at the facility does not exceed 200 gallons. Primers and topcoats exempted under A.I.2.k are not included in the 50 gallons and 200 gallons limits.
- 2.g** The requirements of terms A.I.2.k thru m do not apply to the following:
- i. touch-up of scratched surfaces or damaged paint;
 - ii. hole daubing for fasteners;
 - iii. touch-up of trimmed edges;
 - iv. coating prior to joining dissimilar metal components;
 - v. stencil operations performed by brush or air brush;
 - vi. section joining;
 - vii. touch-up of bushings and other similar parts;
 - viii. sealant detackifying; and
 - ix. painting parts in an area identified in a Title V permit, where the permitting authority has determined that it is not technically feasible to paint the parts in a booth.
- 2.h** The permittee shall conduct the handling and transfer of primers and topcoats to or from containers, tanks, vats, vessels and piping systems in such a manner that minimizes spills.
- 2.i** The permittee shall comply with the organic HAP and VOC content limits specified below:
- i. Organic HAP emissions from primers shall be limited to an organic HAP content level of no more than 350 g/l (2.9 lb/gal) of primer (less water) as applied.
 - ii. VOC emissions from primers shall be limited to a VOC content level of no more than 350 g/l (2.9 lb/gal) of primer (less water and exempt solvents) as applied.
 - iii. Organic HAP emissions from topcoats shall be limited to an organic HAP content level of no more than 420 g/l (3.5 lb/gal) of coating (less water) as applied. Organic HAP emissions from self-priming topcoats shall be limited to an organic HAP content level of no more than 420 g/l (3.5 lb/gal) of self-priming topcoat (less water) as applied.
 - iv. VOC emissions from topcoats shall be limited to a VOC content level of no more than 420 g/l (3.5 lb/gal) of coating (less water and exempt solvents) as applied. VOC emissions from self-priming topcoats shall be limited to a VOC content level of no more than 420 g/l (3.5 lb/gal) of self-priming topcoat (less water and exempt solvents) as applied.
- 2.j** Except as provided for in 40 CFR 63.745(f)(3), the permittee shall use a high volume low pressure (HVLP) spraying technique for the application of all primers and topcoats.
- 2.k** The permittee shall apply coatings that contain inorganic HAP in a booth or hangar in which air flow is directed downward onto or across the part or assembly being coated and exhausted through one or more outlets.
- 2.l** The permittee shall control the air stream from the operation described in A.I.2.k by passing the air stream through a dry particulate filter system certified using methods described in 40 CFR 63.750(o) to meet or exceed the efficiency requirement in 40 CFR 63.745(g)(2)(i)(A) before exhausting it to the atmosphere. The permittee shall install a differential pressure gauge across the filter banks. The permittee shall maintain the system in good working order and take corrective action when the pressure drop exceeds or falls below the filter manufacturer's recommended limit(s).

2. Additional Terms and Conditions (continued)

- 2.m** If the pressure drop across the dry particulate filter system is outside the limit(s) specified by the filter manufacturer or in locally prepared operating procedures, or the booth manufacturer's or locally prepared maintenance procedures for the filter system have not been performed as scheduled, the permittee shall shut down the operation immediately and take corrective action. The operation shall not be resumed until the pressure drop is returned within the specified limit(s).
- 2.n** The permittee shall conduct the handling and transfer of the waste that contains HAP to or from containers, tanks, vats, vessels, and piping systems in such a manner that minimizes spills.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. Enclosed Spray Gun Cleaners - If the permittee employs an enclosed spray gun cleaner, the permittee shall visually inspect the seals and all other potential sources of leaks associated with each enclosed gun spray cleaner system at least once per month. Each inspection shall occur while the system is in operation.
2. The permittee shall maintain the following information for the cleaning operations, as appropriate:
 - a. The name, vapor pressure, and documentation showing the organic HAP constituents of each cleaning solvent used for affected cleaning operations at the facility.
 - b. For each cleaning solvent used in hand-wipe cleaning operations that complies with the composition requirements specified in 40 CFR 63.744(b)(1):
 - i. The name of each cleaning solvent used.
 - ii. All data and calculations that demonstrate that the cleaning solvent complies with one of the composition requirements.
 - iii. Annual records of the volume of each solvent used, as determined from facility purchase records or usage records.
 - c. For each cleaning solvent used in hand-wipe cleaning operations that does not comply with the composition requirements in 40 CFR 63.744(b)(1), but does comply with the vapor pressure requirement in A.1.2.c:
 - i. The name of each cleaning solvent used.
 - ii. The composite vapor pressure of each cleaning solvent used.
 - iii. All vapor pressure test results, if appropriate, data, and calculations used to determine the composite vapor pressure of each cleaning solvent.
 - iv. The amount (in gallons) of each cleaning solvent used each month at each operation.
 - d. A record of all leaks from enclosed spray gun cleaners identified during the inspections that includes for each leak found:
 - i. Source identification.
 - ii. Date leak was discovered.
 - iii. Date leak was repaired.
3. The permittee shall maintain the following information for the prime coat and topcoat application operations, as appropriate:
 - a. The name and VOC content as received and as applied of each primer and topcoat used at the facility.
 - b. The mass of organic HAP emitted per unit volume of coating as applied (less water) (H) and the mass of VOC emitted per unit volume of coating as applied (less water and exempt solvents) (G) for each coating formulation within each coating category used each month.
 - c. All data, calculations, and test results (including EPA Method 24 results) used in determining the values of H and G above.
 - d. The volume (gal) of each coating formulation within each coating category used each month.

III. Monitoring and/or Record Keeping Requirements (continued)

4. The permittee shall continuously monitor the pressure drop across the filter and read and record the pressure drop once per shift while primer or topcoat application operations are occurring. This log shall include the acceptable limit(s) of pressure drop as specified by the filter or booth manufacturer or in locally-prepared operating procedures.
5. The permittee shall collect and record the following information when non-metal parts are coated and any photochemically reactive materials (coatings or cleanup materials) are employed:
 - a. The company identification for each coating and photochemically reactive cleanup material employed.
 - b. The number of gallons of each coating and photochemically reactive cleanup material employed.
 - c. The organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon.
 - d. The total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day.
 - e. The total number of hours the emissions unit was in operation.
 - f. The average hourly organic compound emission rate for all coatings and photochemically reactive cleanup materials, i.e., (d)/(e), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

IV. Reporting Requirements

1. The permittee shall submit semi-annual reports occurring every 6 months from the date of the notification of compliance status that identify:
 - a. Any instance where a non-compliant cleaning solvent is used for a hand-wipe cleaning operation.
 - b. A list of any new cleaning solvents used for hand-wipe cleaning in the previous 6 months and, as appropriate, their composite vapor pressure or notification that they comply with the composition requirements specified in 40 CFR 63.744(b)(1).
 - c. Any instance where a non-compliant spray gun cleaning method is used.
 - d. Any instance where a leaking enclosed spray gun cleaner remains unrepaired and in use for more than 15 days.
 - e. If the operations have been in compliance for the semi-annual period, a statement that the cleaning operations have been in compliance with the applicable standards. Sources shall also submit a statement of compliance signed by a responsible company official certifying that the facility is in compliance with all applicable requirements.
2. The permittee shall submit semi-annual reports occurring every 6 months from the date of the notification of compliance status that identify:
 - a. Each value of H and G recorded above in accordance with term A.III.3 that exceeds the applicable organic HAP or VOC content limit.
 - b. All times when a primer or topcoat application operation was not immediately shut down when the pressure drop across a dry particulate filter system was outside the limit(s) specified by the filter or booth manufacturer or in locally-prepared operating procedures.
 - c. If the operations have been in compliance for the semi-annual period, a statement that the operations have been in compliance with the applicable standards.
3. The permittee shall submit annual reports occurring every 12 months from the date of the notification of compliance status that identify the number of times the pressure drop for the dry filter system was outside the limit(s) specified by the filter or booth manufacturer or in locally prepared operating procedures.

IV. Reporting Requirements (continued)

4. The permittee shall submit deviation (excursion) reports for any daily record indicating an exceedance of the 3.5 lbs VOC/gallon, excluding water and exempt solvents, limitation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
5. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials employed for coating non-metal parts exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day.
 - b. An identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials employed for coating non-metal parts exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

V. Testing Requirements

1. Compliance with the hourly organic compound emission limit for coating non-metal parts shall be based upon the record keeping requirements contained in Section A.III.6 of this permit.
2. Compliance with the daily organic compound emission limit for coating non-metal parts shall be based upon the record keeping requirements contained in Section A.III.6 of this permit.
3. Compliance with HAP, VOC content, and other formulation requirements shall be determined by methods specified in 40 CFR 63.750 and information collected and recorded in Section A.III of this permit.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
Spray Booth #7, Department 9		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Facility Name: **Aeronca, Inc.**
Facility ID: **14-09-01-0001**

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