



Environmental
Protection Agency

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director

9/13/2010

DAN BINGLE
RANSOHOFF, INC
4933 PROVIDENT DRIVE
CINCINNATI, OH 45246

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 1409000842
Permit Number: P0096388
Permit Type: Renewal
County: Butler

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	SYNTHETIC MINOR TO AVOID TITLE V
No	FEDERALLY ENFORCABLE PTIO (FEPTIO)

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

The issuance of this PTI is a final action of the Director 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. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Kevin Boyce," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

If you have any questions, please contact Hamilton County Dept. of Environmental Services at (513)946-7777 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPC Web page, www.epa.ohio.gov/dapc, by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

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

Cc: HCDOES



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
RANSOHOFF, INC**

Facility ID: 1409000842
Permit Number: P0096388
Permit Type: Renewal
Issued: 9/13/2010
Effective: 9/13/2010
Expiration: 5/12/2020



Division of Air Pollution Control
Permit-to-Install and Operate
for
RANSOHOFF, INC

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Authorization

Facility ID: 1409000842
Application Number(s): A0027995
Permit Number: P0096388
Permit Description: Renewal PTIO for emission unit K001, a miscellaneous metal parts paint booth first permitted under PTI 14-04268 issued 3/5/1997.
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 9/13/2010
Effective Date: 9/13/2010
Expiration Date: 5/12/2020
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

RANSOHOFF, INC
4933 PROVIDENT DRIVE
CINCINNATI, OH 45246

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



Authorization (continued)

Permit Number: P0096388
Permit Description: Renewal PTIO for emission unit K001, a miscellaneous metal parts paint booth first permitted under PTI 14-04268 issued 3/5/1997.

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

Emissions Unit ID:	K001
Company Equipment ID:	Misc. metal parts painting operation
Superseded Permit Number:	P0096385
General Permit Category and Type:	Not Applicable

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. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. 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 submitting¹ 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 emissions 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.

¹ Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

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.

B. Facility-Wide Terms and Conditions

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) The following emissions units contained in this permit are subject to 40 CFR Part 63, Subpart HHHHHH, National Emission Standards for Hazardous Air Pollutants (NESHAP) Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources: K001, K002, and P001. The complete NESHAP requirements, including the NESHAP General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA District office or local air agency.

The permittee shall comply with all applicable requirements of 40 CFR Part 63, Subpart HHHHHH. The permittee shall also comply with all the applicable requirements of 40 CFR Part 63, Subpart A (General Provisions) as identified in Table 1 of 40 CFR Part 63, Subpart HHHHHH. Compliance with all applicable requirements shall be achieved by the dates set forth in 40 CFR Part 63, Subpart HHHHHH and Subpart A.

C. Emissions Unit Terms and Conditions



1. K001, Misc. metal parts painting operation

Operations, Property and/or Equipment Description:

Misc metal parts painting operation

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. None.

(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. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(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 are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	<p>Volatile organic compound (VOC) emissions shall not exceed 75 pounds per day from coatings.</p> <p>VOC emissions shall not exceed 830 pounds per month from cleanup materials.</p> <p>VOC emissions shall not exceed 10.55 tons per year (TPY total from coatings and cleanup materials.</p> <p>The VOC emission limits are based on the VOC content limits and the usage limits; therefore, compliance with the VOC content limits and usage limits shall constitute compliance with the VOC emission limits.</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>Particulate Emissions (PE) and Particulate emissions 10 microns and less in diameter shall not exceed 7.8 pounds per day and 1.42 tons per year.</p> <p>The PE emission limitations are based on the maximum usage rates; therefore, no record keeping, reporting, or testing is required to demonstrate compliance with these limitations.</p> <p>See b)(2)a. through b)(2)c. and c)(1).</p>
b.	OAC rule 3745-17-07(B)	Fugitive visible particulate emissions from this emissions unit shall not exceed 20% opacity, as a three minute average.
c.	OAC rule 3745-17-08(B)	The coating operations of this emissions unit shall be conducted inside a building or any other partial enclosure which provides 80% control efficiency for particulate.
d.	OAC rule 3745-21-09(U)(2)(f)	See c)(1)
e.	OAC rule 3745-17-11(C)(3)	The Permit to Install for this emission unit was issued June 19, 1998 (post January 1, 1990) and identified particulate emissions limitations. Therefore, the emission unit is exempt from the requirements of OAC rule 3745-17-11(C)(1) and (2).
f.	<p>40 CFR Part 63, Subpart HHHHHH [40 CFR 63.11169-11180]</p> <p>National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources</p>	See B.1.b)(1) and C.1.b)(2)c.

(2) Additional Terms and Conditions

- a. The VOC content of any coating employed shall not exceed 7.5 lbs/gallon, as applied.
- b. The VOC content of any cleanup material employed shall not exceed 8.3 lbs/gallon, as applied.

- c. The permittee is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR Part 63, Subpart HHHHHH, promulgated January 9, 2008. The permittee shall comply with all applicable requirements for this emissions unit after the January 10, 2011, compliance date in 40 CFR Part 63, Subpart HHHHHH.

c) **Operational Restrictions**

- (1) The permittee shall not exceed the following limitations:

- a. The coating usage shall not exceed 10 gallons per day.
- b. Coatings with a VOC content between 5.0 and 7.5 lbs/gallon (as applied) shall not exceed 600 gallons per year.
- c. Coatings with a VOC content up to 5:0 lbs/gallon (as applied) shall not exceed 2000 gallons per year.
- d. Cleanup material usage shall not exceed 100 gallons per month and 750 gallons per year, as applied.

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall collect and record the following information each day for the coating line:

- a. The name and identification of each coating employed.
- b. The VOC content of each coating, in pounds per gallon (as applied).
- c. The volume, in gallons, of all coatings employed (as applied).
- d. The volume, in gallons, of all coatings with a VOC content up to 5 lbs/gallon employed (as applied).
- e. The volume, in gallons, of all coatings with a VOC content between 5 and 7.5 lbs/gallon employed (as applied).
- f. The daily VOC emission rate from coatings, in pounds per day.

- (2) In addition, the permittee shall maintain separate monthly records of the following information:

- a. The name and identification of each cleanup material employed.
- b. The volume, in gallons, of each cleanup material employed (as applied).
- c. The VOC content of each cleanup material as applied, in pounds per gallon (as applied).

- d. The monthly VOC emission rate, in pounds per month from all cleanup materials. The permittee may take a credit for VOC's in the cleanup material waste sent for disposal as hazardous waste, provided the permittee maintains adequate records to demonstrate the amount in pounds of VOC's being disposed in the waste.
 - (3) The daily VOC emission rate from coatings and the monthly VOC emission rate from cleanup materials shall be summarized annually to demonstrate compliance with the annual VOC emission limitation.
- e) Reporting Requirements
- (1) The permittee shall notify Hamilton County Department of Environmental Services in writing of any daily record showing an exceedance of the daily coating usage or VOC content limits for this emissions unit. The notification shall include a copy of such record and shall be sent to Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.
 - (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) USEPA Methods 24 and 24A shall be used to determine the VOC content for (a) coatings and (b) flexographic and rotogravure printing lines and related coatings, respectively. If, pursuant to 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.
 - (2) Compliance with the material usage limitations outline in c)(1) shall be demonstrated by the recordkeeping requirement in d)(1) and d)(2).
 - (3) Emissions Limitations:

VOC emissions shall not exceed 75 pounds per day of VOC from coating usage only.

Applicable Compliance Method:

Compliance shall be demonstrated by the recordkeeping required in d)(1).

The VOC emission limitation was calculated using the following equation:

(VOC content in pounds per gallon) X (10 gallon usage limitation) = total allowable VOC emissions per day.

$(7.5 \text{ lbs/gal}) \times (10 \text{ gallon usage limitation}) = 75 \text{ pounds of VOC emissions allowable per day.}$

(4) Emissions Limitation:

VOC emissions shall not exceed 830 pounds per month from cleanup.

Applicable Compliance Method:

Compliance shall be demonstrated by the recordkeeping required in d)(2).

The VOC emission limitation was calculated using the following equation:

$(\text{VOC content in pounds per gallon}) \times (100 \text{ gallon usage limitation}) = \text{total allowable VOC emissions per month.}$

$(8.3 \text{ lbs/gal}) \times (100 \text{ gallon usage limitation}) = 830 \text{ pounds of VOC emissions allowable per month.}$

(5) Emissions shall not exceed 10.55 Tons per Year (TPY) VOC total.

Applicable Compliance Method:

Compliance with the annual VOC emissions limitation shall be demonstrated by the recordkeeping in d)(3).

(6) PE and PM10 emissions shall not exceed 7.8 pounds per day and 1.42 Tons per year.

Applicable Compliance Method:

The PE/PM10 emission limitations are based on the maximum usage rates; therefore, no record keeping, reporting, or testing is required to demonstrate compliance with these limitations.

The emissions limitations were calculated using the following equations using 60% transfer efficiency for electrostatic spray and 80% control efficiency for building enclosure:

$10 \text{ gallons of coatings/day} \times 13 \text{ pounds of coating/gallon of coating} \times 0.75 \text{ pounds of solids/pound of coating} \times (1-.60) \times (1-.80) = 7.8 \text{ pounds of PE/PM10}$

$7.8 \text{ pounds of PE/PM10/day} \times 365 \text{ days/year} \times \text{ton}/2000 \text{ pounds} = 1.42 \text{ TPY PE/PM10}$

g) Miscellaneous Requirements

(1) None.