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

RE: FINAL PERMIT TO INSTALL MODIFICATION **CERTIFIED MAIL**

WARREN COUNTY
Application No: 14-01750

	TOXIC REVIEW
	PSD
Y	**SYNTHETIC MINOR**
	CEMS
	MACT
	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

DATE: 9/25/2003

Gayston Corporation
Jay Heitz
PO Box 430 200 Pioneer Boulevard
Springboro, OH 45066

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 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 within thirty (30) days after the notice of the Directors 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. 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, Ohio 43215

Sincerely,

Michael W. Ahern

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA **HCDES**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 14-01750

Application Number:	14-01750
APS Premise Number:	1483140304
Permit Fee:	**$0**
Name of Facility:	Gayston Corporation
Person to Contact:	Jay Heitz
Address:	PO Box 430 200 Pioneer Boulevard Springboro, OH 45066

Location of proposed air contaminant source(s) [emissions unit(s)]:
200 Pioneer Boulevard
Springboro, **Ohio**

Description of proposed emissions unit(s):
Administrative Modification to Miscellaneous Metal Parts Coating Operations.

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described source(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may

be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions

and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

10. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

13. Source Operation and Operating Permit Requirements After Completion of Construction

a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be <u>obtained before</u> the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the source(s) covered by this permit.

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons Per Year
VOC	4.91

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

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K001 - Miscellaneous Metal Parts Coating Operation with a Binks electrostatic spray gun - Modification	OAC rule 3745-31-05(A)(3)	7.5 lbs VOC/hour, coating only 50.0 lbs VOC/day, coating only 2.58 TPY VOC, coating and cleaning material See terms A.2.a, B.1, B.2 and B.3. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(f)(ii) and OAC rule 3745-31-05(D).
	OAC rule 3745-21-09(U)(2)(f)(ii)	The requirements established pursuant to this rule are equivalent to the requirements of OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(D)	See terms A.2.d and A.2.e

2. Additional Terms and Conditions

2.a The VOC content, as applied, of each coating employed shall not exceed 4.98 pounds of VOC per gallon of coating, excluding water and exempt solvents.

2.b Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the emissions limitations, VOC content limitation, and coating and cleanup material usage limitations.

2.c The hourly emission limitations outlined above are based upon the emission unit's

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potential to emit. Therefore, no hourly records are required to demonstrate compliance with these limits.

2.d The total allowable volatile organic compound (VOC) emissions from all coating and cleaning material located at this facility shall not exceed 24.9 TPY based on a rolling, 12-month summation. "Coating" means a protective, decorative, or functional material applied in a thin layer to a surface. Such materials include, but are not limited to, paints, topcoats, varnishes, sealers, stains, washcoats, basecoats, inks and temporary protective coatings. "Cleaning material" means organic solvent used to remove coating materials from equipment used in the aerospace manufacturing and rework operations and associated cleaning operations.

2.e The total allowable emissions of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be determined on a rolling, 12-month summation.

B. Operational Restrictions

1. The maximum daily coating usage for this emissions unit shall not exceed 10 gallons per day, excluding water and exempt solvents.

2. The maximum annual coating usage for this emissions unit shall not exceed 1000 gallons per year, excluding water and exempt solvents.

3. The maximum annual cleaning material usage for this emissions unit shall not exceed 25 gallons per year.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:

a. The name and identification number of each coating and cleaning material employed.

b. The volume, in gallons, of each coating and cleaning material employed, excluding water and exempt solvents.

c. The VOC content of each coating and cleaning material, in pounds of VOC per gallon, as applied, excluding water and exempt solvents.

d. The amount of VOC emitted for all coating and cleaning materials employed (b x c).

2. The permittee shall collect and record the following information each month for emissions units

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K001, K002 and K003 for the purpose of demonstrating compliance with the annual VOC emission rate of 24.9 TPY VOC combined, based on a rolling 12-month summation:

a. The name and identification number of each coating and cleaning material employed. "Coating" means a protective, decorative, or functional material applied in a thin layer to a surface. Such materials include, but are not limited to, paints, topcoats, varnishes, sealers, stains, washcoats, basecoats, inks and temporary protective coatings. "Cleaning material" means organic solvent used to remove coating materials from equipment used in the aerospace manufacturing and rework operations and associated cleaning operations.

b. The volume, in gallons, of each coating, excluding water and exempt solvents and cleaning material employed.

c. The VOC content of each coating (excluding water and exempt solvents)and cleaning material, in pounds of VOC per gallon, as applied.

d. The amount of VOC emitted for all coating and cleaning materials employed, in pounds per month (b x c).

e. The rolling,12-month* usage for coating and cleaning materials, in gallons, excluding water and exempt solvents.

f. The rolling, 12-month* VOC emission rate in tons per year (in tons, rounded off to one decimal place).

*A rolling, 12-month period includes the previous set of 12 months.

g. Monthly records shall be completed within 15 days following the end of each calendar month and shall include the updated rolling, 12-month VOC emission rate.

The records shall be maintained for five years, and upon request the permittee shall submit such records to the appropriate Ohio EPA District Office or local air agency.

3. The permittee shall maintain for this facility all purchase orders and invoices of VOC-containing materials. The permittee shall retain such purchase orders and invoices for at least five years from the date of issuance. Upon request, the permittee shall make available to the Director of the Ohio EPA, or an authorized representative of the Director, such purchase orders and invoices for use in confirming the general accuracy of the records maintained and the reports submitted regarding material usage.

4. The permittee shall collect and record the following information each month for the entire facility:

a. The name and identification number of each coating, employed;

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b. The individual Hazardous Air Pollutant (HAP) content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;

c. The total combined HAP content of each coating in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (b)];

d. The number of gallons of each coating employed;

e. The name and identification of each cleaning material employed;

f. The individual HAP content for each HAP of each cleaning material, in pounds of individual HAP per gallon of cleaning material, as applied;

g. The total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied [sum all the individual HAP contents from (f)];

h. The number of gallons of each cleaning material employed;

i. The total individual HAP emissions for each HAP from all coatings and cleaning materials employed, in pounds or tons per month and pounds or tons per rolling, 12 month period [for each HAP the sum of (b) times (d) for each coating plus the sum of (f) times (h) for each cleaning material];

j. The total combined HAP emissions from all coatings and cleaning materials employed, in pounds or tons per month and pounds or tons per rolling 12 month period [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleaning material].

* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.

D. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit and/or any exceedance of the VOC content limitation. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.

2. The permittee shall also submit annual reports which specify the total VOC emissions and the annual coating and cleaning material usage from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year to the Hamilton County Department of Environmental Services.

3. If the facility (emissions units K001 - K003) has a rolling, 12 month record that exceeds 24.9

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tons of VOC from combined operations associated with the coating and cleaning of aerospace parts, the permittee shall submit the following:

a. Within 30 days after the end of that rolling, 12-month period in which the exceedance occurred, a notification to the Hamilton County Department of Environmental Services that the VOC emission limit was exceeded.

b. Within three months after the end of that rolling, 12-month period in which the exceedance occurred, a compliance plan to the Hamilton County Department of Environmental Services to comply with the presumptive RACT standards specified within USEPA document EPA-453/R-97-004 " Control of Volatile Organic Compound Emissions from Aerospace Manufacturing and Rework Operations" (December 1997). Any divergence from the presumptive RACT standards and the model rule provided within that document shall be described at the time of the submittal of the 3-month compliance plan. Compliance with the presumptive RACT standards is to be achieved within 12 months after the rolling, 12-month period exceedance, unless otherwise requested by the permittee and approved by USEPA as a revision to Ohio's state implementation plan for ozone.

c. Exceeding the 24.9 TPY VOC limit is a violation for each day of the last month of each 12 month period in which the 24.9 TPY limit is exceeded , regardless of whether a compliance plan is submitted.

4. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP usage limitations set forth in this Permit to Install. The permittee shall submit annual reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Compliance with the VOC emissions limitations in section A.1. shall be demonstrated by the following equations:

Emissions limits

7.5 lbs VOC/hr
50.0 lbs VOC/day
2.58 TPY VOC

coating usage (gallon/hr, excluding water and exempt solvents) x VOC content (lbs VOC per gallon, as applied, excluding water and exempt solvents) = lbs VOC/hr;

coating usage (gallon/day, excluding water and exempt solvents) x VOC content (lbs VOC per

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gallon, as applied, excluding water and exempt solvents) = lbs VOC/day; and

[coating usage (gallon/year, excluding water and exempt solvents) x VOC content (lbs VOC per gallon , as applied, excluding water and exempt solvents) + cleaning material usage (gallons/year) x VOC content (lbs VOC/gallon)] x ton/2000 lbs= TPY VOC.

2. Compliance with the operational restrictions in terms B.1, B.2, and B.3 shall be demonstrated by the record keeping requirements in term C.1.

3. Compliance with the HAP emissions limitation in term A.2.e shall be demonstrated by the record keeping in term C.4.

4. OAC rule 3745-21-10(B) shall be used to determine the VOC contents of the coatings and cleanup materials. If pursuant to 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or Method 24A cannot be used, the permittee shall notify the Administrator of USEPA and shall use formulation data for the material to demonstrate compliance until USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

F. Miscellaneous Requirements

1. The terms and conditions listed in this permit to install shall supercede all the air pollution control requirements for this emissions unit contained in permit to install 14-01750 as issued on January 24, 1991.

2. The following terms and conditions are federally enforceable: A.2.a - A.2.e, B, C, D and E.

3. This Federally Enforceable Permit limits the potential emissions of volatile organic compounds from the aerospace manufacturing and rework operations and associated cleaning operations located at this facility to no more than 24.9 TPY during any rolling, 12-month period. Should VOC emissions from the aerospace manufacturing and rework operations and associated cleaning operations exceed 24.9 TPY during any rolling 12-month period, this facility should notify the Hamilton County Department of Environmental Services within 30 days. See term D.3.

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

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K002 - Miscellaneous Metal Parts Coating Operation with a Binks electrostatic spray gun - Modification	OAC rule 3745-31-05(A)(3)	3.4 lbs VOC/hour, coating only 45.0 lbs VOC/day, coating only 2.33 TPY VOC, coating and cleaning material See terms A.2.a, B.1, B.2 and B.3. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(f)(ii) and OAC rule 3745-31-05(D).
	OAC rule 3745-21-09(U)(2)(f)(ii)	The requirements established pursuant to this rule are equivalent to the requirements of OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(D)	See terms A.2.d and A.2.e

2. Additional Terms and Conditions

2.a The VOC content, as applied, of each coating employed shall not exceed 4.47 pounds of VOC per gallon of coating, excluding water and exempt solvents.

2.b Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the emissions limitations, VOC content limitation, and coating and cleanup material usage limitations.

2.c The hourly emission limitations outlined above are based upon the emission unit's

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potential to emit. Therefore, no hourly records are required to demonstrate compliance with these limits.

2.d The total allowable volatile organic compound (VOC) emissions from all coating and cleaning material located at this facility shall not exceed 24.9 TPY based on a rolling, 12-month summation. "Coating" means a protective, decorative, or functional material applied in a thin layer to a surface. Such materials include, but are not limited to, paints, topcoats, varnishes, sealers, stains, washcoats, basecoats, inks and temporary protective coatings. "Cleaning material" means organic solvent used to remove coating materials from equipment used in the aerospace manufacturing and rework operations and associated cleaning operations.

2.e The total allowable emissions of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be determined on a rolling, 12-month summation.

B. Operational Restrictions

1. The maximum daily coating usage for this emissions unit shall not exceed 10 gallons per day, excluding water and exempt solvents.

2. The maximum annual coating usage for this emissions unit shall not exceed 1000 gallons per year, excluding water and exempt solvents.

3. The maximum annual cleaning material usage for this emissions unit shall not exceed 25 gallons per year.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:

a. The name and identification number of each coating and cleaning material employed.

b. The volume, in gallons, of each coating and cleaning material employed, excluding water and exempt solvents.

c. The VOC content of each coating and cleaning material, in pounds of VOC per gallon, as applied, excluding water and exempt solvents.

d. The amount of VOC emitted for all coating and cleaning materials employed (b x c).

2. The permittee shall collect and record the following information each month for emissions units

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K001, K002 and K003 for the purpose of demonstrating compliance with the annual VOC emission rate of 24.9 TPY VOC combined, based on a rolling 12-month summation:

a. The name and identification number of each coating and cleaning material employed. "Coating" means a protective, decorative, or functional material applied in a thin layer to a surface. Such materials include, but are not limited to, paints, topcoats, varnishes, sealers, stains, washcoats, basecoats, inks and temporary protective coatings. "Cleaning material" means organic solvent used to remove coating materials from equipment used in the aerospace manufacturing and rework operations and associated cleaning operations.

b. The volume, in gallons, of each coating, excluding water and exempt solvents and cleaning material employed.

c. The VOC content of each coating (excluding water and exempt solvents)and cleaning material, in pounds of VOC per gallon, as applied.

d. The amount of VOC emitted for all coating and cleaning materials employed, in pounds per month (b x c).

e. The rolling,12-month* usage for coating and cleaning materials, in gallons, excluding water and exempt solvents.

f. The rolling, 12-month* VOC emission rate in tons per year (in tons, rounded off to one decimal place).

*A rolling, 12-month period includes the previous set of 12 months.

g. Monthly records shall be completed within 15 days following the end of each calendar month and shall include the updated rolling, 12-month VOC emission rate.

The records shall be maintained for five years, and upon request the permittee shall submit such records to the appropriate Ohio EPA District Office or local air agency.

3. The permittee shall maintain for this facility all purchase orders and invoices of VOC-containing materials. The permittee shall retain such purchase orders and invoices for at least five years from the date of issuance. Upon request, the permittee shall make available to the Director of the Ohio EPA, or an authorized representative of the Director, such purchase orders and invoices for use in confirming the general accuracy of the records maintained and the reports submitted regarding material usage.

4. The permittee shall collect and record the following information each month for the entire facility:

a. The name and identification number of each coating, employed;

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b. The individual Hazardous Air Pollutant (HAP) content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;

c. The total combined HAP content of each coating in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (b)];

d. The number of gallons of each coating employed;

e. The name and identification of each cleaning material employed;

f. The individual HAP content for each HAP of each cleaning material, in pounds of individual HAP per gallon of cleaning material, as applied;

g. The total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied [sum all the individual HAP contents from (f)];

h. The number of gallons of each cleaning material employed;

i. The total individual HAP emissions for each HAP from all coatings and cleaning materials employed, in pounds or tons per month and pounds or tons per rolling, 12 month period [for each HAP the sum of (b) times (d) for each coating plus the sum of (f) times (h) for each cleaning material];

j. The total combined HAP emissions from all coatings and cleaning materials employed, in pounds or tons per month and pounds or tons per rolling 12 month period [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleaning material].

* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.

D. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit and/or any exceedance of the VOC content limitation. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.

2. The permittee shall also submit annual reports which specify the total VOC emissions and the annual coating and cleaning material usage from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year to the Hamilton County Department of Environmental Services.

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3. If the facility (emissions units K001 - K003) has a rolling, 12 month record that exceeds 24.9 tons of VOC from combined operations associated with the coating and cleaning of aerospace parts, the permittee shall submit the following:

a. Within 30 days after the end of that rolling, 12-month period in which the exceedance occurred, a notification to the Hamilton County Department of Environmental Services that the VOC emission limit was exceeded .

b. Within three months after the end of that rolling, 12-month period in which the exceedance occurred, a compliance plan to the Hamilton County Department of Environmental Services to comply with the presumptive RACT standards specified within USEPA document EPA-453/R-97-004 " Control of Volatile Organic Compound Emissions from Aerospace Manufacturing and Rework Operations" (December 1997). Any divergence from the presumptive RACT standards and the model rule provided within that document shall be described at the time of the submittal of the 3-month compliance plan. Compliance with the presumptive RACT standards is to be achieved within 12 months after the rolling, 12-month period exceedance, unless otherwise requested by the permittee and approved by USEPA as a revision to Ohio's state implementation plan for ozone.

c. Exceeding the 24.9 TPY VOC limit is a violation for each day of the last month of each 12 month period in which the 24.9 TPY limit is exceeded , regardless of whether a compliance plan is submitted.

4. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP usage limitations set forth in this Permit to Install. The permittee shall submit annual reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Compliance with the VOC emissions limitations in section A.1. shall be demonstrated by the following equations:

Emissions limits

3.4 lbs VOC/hr
45.0 lbs VOC/day
2.33 TPY VOC

coating usage (gallon/hr, excluding water and exempt solvents) x VOC content (lbs VOC per gallon, as applied, excluding water and exempt solvents) = lbs VOC/hr;

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coating usage (gallon/day, excluding water and exempt solvents) x VOC content (lbs VOC per gallon, as applied, excluding water and exempt solvents) = lbs VOC/day; and

[coating usage (gallon/year, excluding water and exempt solvents) x VOC content (lbs VOC, as applied, excluding water and exempt
solvents) + cleaning material usage (gallons/year) x VOC content (lbs VOC/gallon)] x ton/2000 lbs = TPY VOC.

2. Compliance with the operational restrictions in terms B.1, B.2, and B.3 shall be demonstrated by the record keeping requirements in term C.1.

3. Compliance with the HAP emissions limitation in term A.2.e shall be demonstrated by the record keeping in term C.4.

4. OAC rule 3745-21-10(B) shall be used to determine the VOC contents of the coatings and cleanup materials. If pursuant to 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or Method 24A cannot be used, the permittee shall notify the Administrator of USEPA and shall use formulation data for the material to demonstrate compliance until USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

F. Miscellaneous Requirements

1. The terms and conditions listed in this permit to install shall supercede all the air pollution control requirements for this emissions unit contained in permit to install 14-01750 as issued on January 24, 1991.

2. The following terms and conditions are federally enforceable: A.2.a - A.2.e, B, C, D and E.

3. This Federally Enforceable Permit limits the potential emissions of volatile organic compounds from the aerospace manufacturing and rework operations and associated cleaning operations located at this facility to no more than 24.9 TPY during any rolling, 12-month period. Should VOC emissions from the aerospace manufacturing and rework operations and associated cleaning operations exceed 24.9 TPY during any rolling 12-month period, this facility should notify the Hamilton County Department of Environmental Services within 30 days. See term D.3.

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