



08/18/2026

Brittany Shumate
Kyocera SENCO Industrial Tools, Inc.
8450 Broadwell Road
Cincinnati, OH 45244

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL

Facility ID: 1431340977
Permit Number: P0140548
Permit Type: Initial Installation
County: Hamilton

Yes	TOXIC REVIEW
No	PSD
Yes	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	MAJOR GHG
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio Environmental Protection Agency (Ohio EPA) [Weekly Review and Public Notices](#) website. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Ohio EPA document search webpage: [eDocument Search](#). Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrea Moore
Permitting Section
Ohio EPA, DAPC
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

and

Southwest Ohio Air Quality Agency
1701 Patricia McCollum Way
DEPT 56
Cincinnati, OH 45237

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published on the Ohio EPA [Weekly Review and Public Notices](#) website. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Southwest Ohio Air Quality Agency at (513)946-7777.

Sincerely,

Robert Hodanbosi
Chief, Division of Air Pollution Control

cc: U.S. EPA Region 5 - Via E-Mail Notification
SWOQA; Indiana; Kentucky

PUBLIC NOTICE

The following matters are the subject of this public notice by the Ohio Environmental Protection Agency. The complete public notice, including any additional instructions for submitting comments, requesting information, a public hearing, or filing an appeal may be obtained at: [Weekly Review and Public Notices | Ohio Environmental Protection Agency](#) or Hearing Clerk, Ohio EPA, 50 W. Town St., Columbus, Ohio 43215. Ph: 614-644-3037 email: HClerk@epa.ohio.gov

Draft Air Pollution Permit-to-Install Initial Installation

Kyocera SENCO Industrial Tools, Inc.
8450 BROADWELL RD.
Cincinnati, OH 45244-1611

ID#: P0140548

Date of Action: 08/18/2026

Permit Desc: This permit is an Initial PTI for the installation of two (2) new band surface coating lines with induction heaters. The permit includes Federally Enforceable restrictions to avoid PSD review for a significant increase in VOC emissions at an existing Title V facility. The PTI also formalizes the enforceability of OAC rule 3745-21-26 requirements new to the Cincinnati area (VOC RACT).

The permit and complete instructions for requesting information or submitting comments may be obtained at: <https://edocpub.epa.ohio.gov/publicportal/edochome.aspx> - Search by entering the permit # or by contacting: Kurt Smith, Southwest Ohio Air Quality Agency, 250 William Howard Taft Rd., Cincinnati, OH 45219. Ph: (513)946-7777



**Environmental
Protection
Agency**

DRAFT

Division of Air Pollution Control

Permit-to-Install

for

Kyocera SENCO Industrial Tools, Inc.

Facility ID:	1431340977
Permit Number:	P0140548
Permit Type:	Initial Installation
Issued:	08/18/2026
Effective:	To be entered upon final issuance



Division of Air Pollution Control

Permit-to-Install

for

Kyocera SENCO Industrial Tools, Inc.

Table of Contents

Authorization.....	5
List of Commonly Used Abbreviations	7
A. Standard Terms and Conditions.....	8
B. Facility Wide Terms and Conditions	16
C. Emissions Unit Terms and Conditions	18
1. Emissions Unit Group - Band Lines IBL3 and IBL4: K383, K384	19



Draft Permit-to-Install
Kyocera SENCO Industrial Tools, Inc.
Permit Number: P0140548
Facility ID: 1431340977
Effective Date: To be entered upon final issuance

Authorization

Facility ID: 1431340977
Facility Description: Nail and staple manufacturing
Application Number(s): A0081900
Permit Number: P0140548
Permit Type: Permit-To-Install
Permit Fee: \$600.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 08/18/2026
Effective Date: To be entered upon final issuance

This document constitutes issuance of a Permit-to-Install for the emissions unit(s) identified on the following page to:

Kyocera SENCO Industrial Tools, Inc.
8450 BROADWELL RD.
Cincinnati, OH 45244-1611

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Southwest Ohio Air Quality Agency
1701 Patricia McCollum Way
DEPT 56
Cincinnati, OH 45237
(513)946-7777

The above-named entity is hereby granted this Permit-to-Install 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 and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

John Logue

Director

Authorization (continued)

Permit Number:P0140548

Permit Description:This permit is an Initial PTI for the installation of two (2) new band surface coating lines with induction heaters. The permit includes Federally Enforceable restrictions to avoid PSD review for a significant increase in VOC emissions at an existing Title V facility. The PTI also formalizes the enforceability of OAC rule 3745-21-26 requirements new to the Cincinnati area (VOC RACT).

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

Group Name:Band Lines IBL3 and IBL4

Emissions Unit ID:	K383
Company Equipment ID:	IBL3
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K384
Company Equipment ID:	IBL4
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

List of Commonly Used Abbreviations

AP-42 = U.S. EPA's Compilation of Air Pollution Emissions Factors	HVLP = high volume, low pressure	PER = Permit Evaluation Report
ASTM = American Society for Testing and Materials	LAER = lowest achievable emission rate	PM = particulate matter
BACT = Best Available Control Technology	lb(s)/hr = pound(s) per hour	PM ₁₀ = particulate matter with an aerodynamic diameter less than or equal to 10 microns
BAT = Best Available Technology	LDAR = leak detection and repair	PM _{2.5} = particulate matter with an aerodynamic diameter less than or equal to 2.5 microns
CAA = Clean Air Act	LPG = liquefied petroleum gas/propane	ppb = parts per billion
CAM = compliance assurance monitoring	MACT = maximum achievable control technology	ppm = parts per million
CEMS = continuous emissions monitoring system	MAGLC = maximum acceptable ground level concentration	PSD = Prevention of Significant Deterioration
CFC = chlorofluorocarbon	mg/m ³ = milligrams per cubic meter	psi = pounds per square inch
CFR = Code of Federal Regulations	MM = million	psia = pounds per square inch absolute
CH ₄ = methane	MMBtu = million British Thermal Units	PTE = potential-to-emit
CI = compression ignition	MSDS = material safety data sheet	PTI = Permit-to-Install
CO = carbon monoxide	MSW = municipal solid waste	PTIO = Permit-to-Install and Operate
CO ₂ = carbon dioxide	NAAQS = National Ambient Air Quality Standard	PTO = Permit-to-Operate
COM = continuous opacity monitor	NESHAP = National Emission Standard for Hazardous Air Pollutants	PWR = process weight rate
DAPC = Division of Air Pollution Control	NG = natural gas	RACM = reasonably available control measures
DO/LAA = District Office/Local Air Agency	ng/m ³ = nanograms per cubic meter	RACT = reasonably available control technology
dscf = dry standard cubic foot	NH ₃ = ammonia	RATA = relative accuracy test audit
EAC = emissions activity category	NMHC = non-methane hydrocarbons	RTO = regenerative thermal oxidizer
eDocs = electronic documents database	NMOC = non-methane organic compound	SB265 = Senate Bill 265
ERAC = Environmental Review Appeals Commission	NO = nitrogen oxide	scfm = standard cubic feet per minute
ESP = electrostatic precipitator	NO ₂ = nitrogen dioxide	SI = spark ignition
EU = emissions unit	NO _x = nitrogen oxides	SIP = State Implementation Plan
FEPTIO = Federally Enforceable Permit-to-Install and Operate	NSPS = New Source Performance Standard	SO ₂ = sulfur dioxide
FER = Fee Emissions Report	NSR = New Source Review	SSMP = startup, shutdown, and malfunction plan
FR = Federal Register	NTV = Non-Title V	TDS = total dissolved solids
GACT = generally achievable control technology	O&M = operation and maintenance	TLV = threshold limit value
GHG = greenhouse gases	OAC = Ohio Administrative Code	TO = thermal oxidizer
gr/dscf = grains per dry standard cubic foot	OC = organic compound	TPH = ton(s) per hour
H ₂ S = hydrogen sulfide	Ohio EPA = Ohio Environmental Protection Agency	TPY = ton(s) per year
H ₂ SO ₄ = sulfuric acid	ORC = Ohio Revised Code	TSP = total suspended particulates
HAP = hazardous air pollutant	Pb = lead	VE = visible particulate emissions
HCl = hydrogen chloride	PBR = Permit-By-Rule	VMT = vehicle miles traveled
HF = hydrogen fluoride	PCB = polychlorinated biphenyl	VOC = volatile organic compound
Hg = mercury	PE = particulate emissions	WPP = work practice plan
hp = horsepower	PEMS = predictive emissions monitoring system	µg/m ³ = micrograms per cubic meter

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under state law only:
 - (1) Standard Term and Condition A.2.a), Severability Clause
 - (2) Standard Term and Condition A.3.c) through A. 3.e), General Requirements
 - (3) Standard Term and Condition A.6.c), Compliance Requirements
 - (4) Standard Term and Condition A.9., Reporting Requirements
 - (5) Standard Term and Condition A.10., Applicability
 - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
 - (7) Standard Term and Condition A.14., Public Disclosure
 - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (9) Standard Term and Condition A.16., Fees
 - (10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

- a) 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.
- b) All terms and conditions designated in parts B. and C. of this permit are federally enforceable as a practical matter, if they 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 and the state and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under state law only, only if specifically identified in this permit as such.

3. General Requirements

- a) 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 re-issuance, or modification.
- 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, 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 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.

4. Monitoring and Related Record Keeping 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:
 - (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) 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, 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.
- 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:
 - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Southwest Ohio Air Quality Agency.
 - (2) 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 made to the Southwest Ohio Air Quality Agency. The written reports shall be submitted quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.



- (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the Southwest Ohio Air Quality Agency every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semiannual report, which states that no deviations occurred during that period.
 - (4) This permit is for an emissions unit located at a Title V facility. 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.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

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, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Southwest Ohio Air Quality 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 shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

6. Compliance Requirements

- a) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the appropriate Ohio EPA District Office or contracted local air agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the electronic signature date shall constitute the date that the required application, notification or report is considered to be "submitted". Any document requiring signature may be represented by entry of the personal identification number (PIN) by responsible official as part of the electronic submission process or by the scanned attestation document signed by the Authorized Representative that is attached to the electronically submitted written report.

Any document (including reports) required to be submitted and required by a federally applicable requirement in this 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:
 - (1) 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.
 - (2) 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 ORC section 3704.08.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) 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 Southwest Ohio Air Quality 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:
 - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) 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.

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

8. 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.

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Southwest Ohio Air Quality 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 state-only required 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 Southwest Ohio Air Quality 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, 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.)

10. Applicability

This permit-to-install is applicable only to the emissions unit(s) identified in the permit-to-install. Separate applications must be made to the Director for the installation or modification of any other emissions unit(s) not exempt from the requirement to obtain a permit-to-install.

11. Construction of New Sources(s) and Authorization to Install

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. 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 this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit 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.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended once by twelve months if application is made to the Director within a reasonable time before the termination date and the permittee shows good cause for any such extension.
- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., 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) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update electronically will constitute notifying the Director of the permanent shutdown of the affected emissions unit(s).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., 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). All records relating to any permanently shut down emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

Unless otherwise exempted, no emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31 and OAC Chapter 3745-77 if the restarted operation is subject to one or more applicable requirements.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or any other reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

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 months after commencing operation of the emissions units covered by this permit. However, if operation of the proposed new or modified source(s) as authorized by this permit would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d) must be obtained before operating the source in a manner that would violate the existing Title V permit requirements.

13. Construction Compliance Certification

The applicant shall identify the following dates in the "Air Services" facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. 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.

15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

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 by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

16. 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 any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in "Air Services" once the transfer is legally completed. The change must be submitted through "Air Services" within thirty days of the ownership transfer date.

18. 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.

19. 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.

B. Facility Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - a) None.

C. Emissions Unit Terms and Conditions

1. Emissions Unit Group - Band Lines IBL3 and IBL4: K383, K384

EU ID	Operations, Property and/or Equipment Description
K383	Band Line IBL3 with Induction Heater
K384	Band Line IBL4 with Induction Heater

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) d)(4).

- 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) ORC 3704.03(T)	Coatings applied in the surface coating operations shall not exceed the VOC content limitation(s) for low-VOC coatings as outlined in b)(2)d., Table 1. The requirements of this rule equivalent to the requirements established pursuant to OAC rule 3745-21-26.
b.	OAC rule 3745-31-05(D) <i>Synthetic Minor to Avoid PSD for VOC as precursor to ozone</i>	VOC emissions from emissions units K383 and K384, combined, shall not exceed 39.0 TPY, as a rolling, 12-month summation. See b)(2)c, c)(1), and c)(2).
c.	OAC rule 3745-17-11(C)	Exempt from the requirements pursuant to OAC rule 3745-17-11(A)(1)(h) for surface coating operations using flow or brush coating.
d.	OAC rule 3745-21-09(U)(1)(a)	See b)(2)a.
e.	OAC rule 3745-21-26 <i>RACT – Surface coating of miscellaneous metal parts</i>	Maximum VOC Content Limitations for Metal Parts and Products Coatings in OAC rule 3745-21-26(C)(1) Table 1; see b)(2)d.

		Coating Application Method Standards in OAC rule 3745-21-26(D); see c)(3) Work Practice Standards in OAC rule 3745-21-26(E); see c)(4)
f.	OAC rule 3745-21-28 <i>RACT – Miscellaneous industrial adhesives and sealants</i>	Exempt from the VOC content limitation standards and control requirements in this rule. See b)(2)b. and d)(3).

(2) Additional Terms and Conditions

- a. For any source located in Hamilton county subject to paragraph OAC rule 3745-21-09(U) prior to the effective date of OAC rule 3745-21-09, the requirement to comply with the requirements of 21-09(U) shall continue until the source becomes subject to and complies with rule 3745-21-26 of the Administrative Code.

The OAC Chapter 3745-21 (VOC RACT) rule revisions for the Cincinnati area including Hamilton County were effective March 27, 2022. These revisions include the implementation of OAC rule 3745-21-26, surface coating of miscellaneous metal parts to sources in Hamilton County. This Draft before Final PTI makes the requirements of OAC rule 3745-21-26 enforceable so that the requirements of 21-09(U) no longer apply.

- b. Pursuant to OAC rule 3745-21-28(A)(1)(a), paragraphs (B) through (G) of OAC rule 3745-21-28 do not apply to any source where the total actual VOC emissions from all miscellaneous industrial adhesive and sealant application processes (including emissions from related surface preparation and cleanup activities) at the facility are less than 3.0 tons per 12-month rolling period, before the application of control systems and devices.
- c. The emissions of VOC from emissions units K383 and K384, combined shall not exceed 39.0 TPY*, based upon a rolling, 12-month summation of the monthly emissions. To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Maximum Allowable
Cumulative Emissions of VOC

Month(s) Emissions (TPY)

1 3.3
1-2 6.5
1-3 9.8
1-4 13.0



1-516.3
1-6 19.5
1-722.8
1-826.0
1-929.3
1-1032.5
1-1135.8
1-1239.0

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual emission limitation for VOC shall be based upon a rolling, 12-month summation of the VOC emissions.

*based on VOC input; see c)(2)

d. VOC emission limitations

Option one. VOC content limitations based on low-VOC coatings.

Table 1.- Metal parts and products maximum VOC content limitations (mass of VOC per volume of coating (excluding water and exempt compounds, as applied).

Coating Category	Air Dried, Pound VOC per Gallon Coating	Baked, Pound VOC per Gallon Coating
General One-Component	2.8	2.3
General Multi-Component	2.8	2.3
Camouflage	3.5	3.5
Electric-Insulating Varnish	3.5	3.5
Etching Filler	3.5	3.5
Extreme High-Gloss	3.5	3.0
Extreme Performance	3.5	3.0
Heat-Resistant	3.5	3.0
High-Performance Architectural	6.2	6.2
High-Temperature	3.5	3.5
Metallic	3.5	3.5
Military Specification	2.8	2.3
Mold-Seal	3.5	3.5
Pan Backing	3.5	3.5



Prefabricated Architectural Multi-Component	3.5	2.3
Prefabricated Architectural One-Component	3.5	2.3
Pretreatment	3.5	3.5
Repair and Touch-Up	3.5	3.0
Silicone Release	3.5	3.5
Solar-Absorbent	3.5	3.0
Vacuum Metallizing	3.5	3.5
Drum, New, Exterior	2.8	2.8
Drum, New, Interior	3.5	3.5
Drum, Reconditioned, Exterior	3.5	3.5
Drum, Reconditioned, Interior	4.2	4.2

c) Operational Restrictions

- (1) The permittee shall employ only acetone or other non-VOC containing products as clean-up materials in K383 and K384.
- (2) The maximum annual VOC input, as applied, of materials employed in emissions units K383 and K384, combined, shall not exceed 39.0 TPY, as a rolling, 12-month summation. The VOC input shall be determined by multiplying the number of gallons of coating employed per month by the VOC content of each coating in pounds per gallon [see record keeping requirements in d)(1)].
- (3) OAC rule 3745-21-26, surface coating application methods
One, or a combination, of the following application methods shall be used for coating application, except when complying using option three (add-on air pollution control equipment only) under paragraph (C)(3) of this rule or exempt under paragraph (A)(3) of this rule:
 - a. Electrostatic equipment.
 - b. High volume low pressure (HVLP) spray equipment.
 - c. Flow coating.
 - d. Roller coating.
 - e. Dip coating, including electrodeposition.
 - f. Airless spray.



- g. Air-assisted airless spray.
 - h. Other coating application method capable of achieving a transfer efficiency equivalent or better than achieved by HVLP spraying.
 - (4) OAC rule 3745-21-26, work practice standards

Work practices shall be used to minimize VOC emissions from mixing operations, storage tanks and other containers, and handling operations for coatings, thinners, cleaning materials, and waste materials. Work practices shall include, but are not limited to, the following:

 - a. Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.
 - b. Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials.
 - c. Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.
 - d. Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one location to another in closed containers or pipes.
 - e. Minimize VOC emissions from the cleaning of application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall maintain monthly records of the following information:
 - a. the name and identification number of each coating employed;
 - b. the VOC content of each coating employed (as applied), in pounds of VOC per gallon of coating;
 - c. the total number of gallons of each coating employed;
 - d. the monthly combined VOC emission totals from emissions units K381 and K382 [the summation of d)(1)b. x d)(1)c. then divided by 2000 pounds per ton] for each coating employed;
 - e. the monthly combined VOC input for emissions units K381 and K382, in tons, determined by multiplying the VOC content of each coating from d)(1)b. by the gallon usage in d)(1)c. This value is then divided by 2000 pounds per ton;
 - f. during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative VOC emissions, as calculated in d., for each cumulative period; Month(s) 1, 1-2, 1-3, etc.
 - g. beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the updated rolling 12-month total combined VOC emission rate, in tons [the total amount of VOC emissions for the current month



recorded in d)(1)d. plus the total amount of VOC emissions for the previous eleven calendar months, divided by 2000 pounds/ton];

- h. beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the updated rolling 12-month total combined VOC input rate, in tons [the total amount of VOC input for the current month recorded in d)(1)e. plus the total amount of VOC input for the previous eleven calendar months];
- i. for compliance with Table 1. in b)(2)d., the VOC content of each coating in pounds of VOC per gallon of coating, excluding water and exempt compounds; and
- j. the identification of each clean-up material employed.

(2) OAC rule 3745-21-26, VOC emissions limitations, Table 1.

Compliance with the VOC emission limitations specified by OAC rule 3745-21-26 in b)(1)d. are based upon a weighted average by volume of all coating materials employed in the surface coating operations in any one day. The VOC contents and densities of the coating materials subject shall be determined in accordance with paragraph (B) of rule 3745-21-10 of the Administrative Code.

The owner or operator of the surface coating operations line shall demonstrate the on-going status of compliance with the applicable VOC emission limitations by means of one of the recordkeeping and reporting requirement alternatives specified in paragraph (B)(3) of rule 3745-21-09 of the Administrative Code.

All records made to determine compliance with OAC rule 3745-21-26 shall be maintained for five (5) years from the date such record is created and shall be made available to the director or any authorized representative of the director within ninety days of a request.

(3) Miscellaneous industrial adhesive and sealant application processes not subject to paragraphs (B) to (G) of OAC rule 3745-21-28

In accordance with OAC rule 3745-21-28(H)(1), the owner or operator of a miscellaneous industrial adhesive and sealant application process that determines the total actual VOC emissions, before the application of air pollution control systems, from all miscellaneous industrial adhesive application processes (including emissions from surface preparation and cleanup activities) at the facility are not equal to or greater than the limitation specified in b)(2)a., and, therefore, the facility is not subject to paragraphs (B) to (G) of OAC rule 3745-21-28, shall select one of the following methods and maintain the following records for a period of five years:

- a. Monthly recordkeeping method, as follows:
 - i. Total pounds or gallons of each adhesive, sealant, adhesive primer, sealant primer, cleanup solvent and surface preparation solvent used per calendar month.
 - ii. VOC content [per cent by weight or pounds per gallon, whichever is consistent with the records kept in OAC rule 3745-21-28(H)(1)(a)(i)] of each adhesive,



sealant, adhesive primer, sealant primer, cleanup solvent and surface preparation solvent used per calendar month.

- iii. The total monthly VOC emissions, before the application of capture systems and control devices, in pounds for all adhesives, sealant, adhesive primer, sealant primer, cleanup solvent and surface preparation solvent employed per calendar month.
- iv. The rolling 12-month summation of VOC emissions, in tons, before the application of control systems and devices. The rolling 12-month summation shall be calculated as the total VOC emissions for the current calendar month, plus the total VOC emissions from the previous eleven calendar months.

b. Daily emissions method.

Provided total VOC emissions are less than 15.0 pounds per day, the owner or operator may elect to maintain the following records in lieu of the records required under OAC rule 3745-21-28(H)(1)(a):

- i. Total pounds or gallons of each adhesive, sealant, adhesive primer, sealant primer, cleanup solvent and surface preparation solvent used per day.
- ii. VOC content [per cent by weight or pounds per gallon, whichever is consistent with the records kept in OAC rule 3745-21-28(H)(1)(b)(i)] of each adhesive, sealant, adhesive primer, sealant primer, cleanup solvent and surface preparation solvent used per day.
- iii. The total daily VOC emissions, before the application of capture systems and control devices, in pounds for all adhesives, sealant, adhesive primer, sealant primer, cleanup solvent and surface preparation solvent employed per day.

- (4) Modeling to demonstrate compliance with, the “Toxic Air Contaminant Statute”, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit’s maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified PTI prior to making a “modification” as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTI.

e) Reporting Requirements

- (1) The permittee shall comply with the reporting requirements specified in the Standard Terms and Conditions of this permit, including any deviations of the emission limitations and operational restrictions applicable to this emissions unit.
- (2) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of non-complying coatings. 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 30 days following the end of the calendar month.



- (3) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
- a. all exceedances of the rolling, 12-month emission limitation for VOC and, for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels [both referenced in b)(2)c.]; and
 - b. all exceedances of the rolling, 12-month operational restriction for VOC in c)(2).

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions in Section A of this permit.

- (4) OAC rule 3745-21-26, compliance certification
- a. The owner or operator of a surface coating line that is subject to OAC rule 3745-21-26 shall notify the Ohio EPA district office or local air agency (SWOAQA) in writing within thirty (30) days following the completion of any of the following:
 - i. For a coating line subject to the VOC emission requirements in b)(1)d., Table 1., the first documented achievement of compliance with each of the requirements;
 - ii. The compliance certification shall provide the following, where applicable:
 - (a) A description of the requirements.
 - (b) A description of the records that document continuing compliance.
 - (c) The results of any compliance tests, including documentation of test data.
 - (d) The results of any records that document continuing compliance, including calculations.
 - (e) A statement by the owner or operator as to whether the subject coating line has complied with the requirements.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitations:

VOC emissions from emissions units K383 and K384, combined, shall not exceed 39.0 TPY, as a rolling, 12-month summation.

Maximum Allowable Cumulative Emissions of VOC in b)(2)c.

Applicable Compliance Method:

Compliance with the combined VOC emissions limitations shall be demonstrated by the recordkeeping requirements in d)(1).



b. Emission Limitation:

VOC content limitations (excluding water and exempt compounds, as applied) for low-VOC coatings applied in metal parts and products surface coating operations as outlined in b)(2)d., Table 1.

Applicable Compliance Method:

Compliance with the VOC content limitations shall be demonstrated by the recordkeeping requirements in d)(2).

USEPA Method 24 shall be used to determine the VOC content for coatings. If, pursuant to Method 24 as outlined in 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

g) Miscellaneous Requirements

(1) None.