

Synthetic Minor Determination and/or **Netting Determination**

Permit To Install: 14-05876

A. Source Description

Milacron Inc. is a process job shop that applies protective and paint coatings to miscellaneous parts. This permit to install modification application requests to group together previously permitted emissions units into four emissions units which are: K002 (Bay Area 1 Spray Booth), K005 (Bay Area 10 Spray Booth), K009 (Bay Area 5 Coating Line) and P001 (Solvent Wipe and Spray Cleaning).

B. Facility Emissions and Attainment Status

The facility is located in Clermont county emit volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions. Clermont county is designated as an attainment area for PM/PM10, SO2, NOx and CO but is non-attainment for VOCs and PM2.5 emissions.

C. Source Emissions

The facility in this permit to install modification application has requested to have a synthetic minor limits on VOC and HAP emissions throughout the facility, which will restrict the facility wide VOC emissions under 100 TPY and facility wide HAP emissions to 9.9 TPY for a single HAP and 24.9 TPY for combined HAPs. This permit will establish VOC content, usage limitations, and emission limitations to ensure compliance.

D. Conclusion

The facility will avoid being a major source by having synthetic minor limits on VOC emissions under 100 TPY and HAP emissions at 9.9 TPY for a single HAP and 24.9 TPY for combined HAPs. Compliance with all the applicable rules will be determined based on the VOC and HAP contents of the coating and cleanup, usage records and monthly record keeping. Based on the limitations established in this permit, this facility not be subject to the MACT standards or the Title V permit requirements since it will be a minor source.



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL
CLERMONT COUNTY**

CERTIFIED MAIL

Street Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov.
Center

Application No: 14-05876

Fac ID: 1413020004

DATE: 11/28/2006

Milacron Incorporated - Afton
James Weaver
4165 Halfacre Road
Batavia, OH 45103

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on 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 proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$800** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA

HCDES

OH-KY-IN REG COUNCIL OF GOVT

KY

IN

CLERMONT COUNTY

PUBLIC NOTICE

**ISSUANCE OF DRAFT PERMIT TO INSTALL 14-05876 FOR AN AIR CONTAMINANT SOURCE FOR
Milacron Incorporated - Afton**

On 11/28/2006 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Milacron Incorporated - Afton**, located at **4165 Halfacre Road, Batavia, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 14-05876:

Modification of the existing permit for coating lines and spray cleaning.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Brad Miller, Hamilton County Department of Environmental Services, 250 William Howart Taft Pkwy,
Cincinnati, OH 45219-2660 [(513)946-7777]



**Permit To Install
Terms and Conditions**

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

DRAFT PERMIT TO INSTALL 14-05876

Application Number: 14-05876
Facility ID: 1413020004
Permit Fee: **To be entered upon final issuance**
Name of Facility: Milacron Incorporated - Afton
Person to Contact: James Weaver
Address: 4165 Halfacre Road
Batavia, OH 45103

Location of proposed air contaminant source(s) [emissions unit(s)]:
**4165 Halfacre Road
Batavia, Ohio**

Description of proposed emissions unit(s):
Modification of the existing permit for coating lines and spray cleaning.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described emissions unit(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 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

Director

Milacron Incorporated - Afton
PTI Application: 14-05876
Issued: To be entered upon final issuance
Part I - GENERAL TERMS AND CONDITIONS

Facility ID: 1413020004

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 (i.e., postmarked) 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.)

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,

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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

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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

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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

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This 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 ninety (90) days after commencing operation of the emissions unit(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

<u>Pollutant</u>	<u>Tons Per Year</u>
Individual HAP	9.9
Combined HAPs	24.9
VOC	75.43

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 - (K002) - Bay Area 1 Spray Booth

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>Volatile Organic Compound (VOC) emissions shall not exceed 35.0 pounds per hour from coating usage only.</p> <p>See term and condition A.2.c.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(1)(c) and 3745-31-05(C).</p>
OAC rule 3745-21-09(U)(1)(c)	See term and condition A.2.b.
OAC rule 3745-31-05(C)	See terms and conditions A.2.d, A.2.e, B.1, and B.2.

2. Additional Terms and Conditions

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the VOC content, usage, and emission limitations.
- 2.b The VOC content, as applied, of each coating employed in this emissions unit shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.
- 2.c The VOC content of each cleanup material employed in this emissions unit shall not exceed 7.0 pounds of VOC per gallon of cleanup material, as applied.
- 2.d The total usage of hazardous air pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from K002 (Bay Area 1 Spray Booth), K005 (Bay Area 10 Spray Booth), K009 (Bay Area 5 Coating Line), P001 (Solvent Wipe and Spray Cleaning) and any registration status and/or permit exempt emissions units, shall not exceed 9.9 TPY* for any single HAP, as a

Emissions Unit ID: **K002**

rolling, 12-month summation and 24.9 TPY* for any combination of HAPs, as a rolling, 12-month summation.

*This assumes that the amount of HAPs used is equivalent to the amount of HAPs that will evaporate and be emitted.

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

- 2.e** The volatile organic compound (VOC) emissions from emissions units K002 (Bay Area 1 Spray Booth), K005 (Bay Area 10 Spray Booth), and K009 (Bay Area 5 Coating Line) shall not exceed 57.93 TPY based upon a rolling, 12-month summation.

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

- 2.f** The hourly emission limitation outlined in term A.1. is based upon the emissions unit's potential to emit. Therefore, no records are required to demonstrate compliance with this limitation.

B. Operational Restrictions

1. The maximum annual coating usage from emissions units K002 (Bay Area 1 Spray Booth), K005 (Bay Area 10 Spray Booth) and K009 (Bay Area 5 Coating Line) shall not exceed 12,500 gallons, excluding water and exempt solvents based upon a rolling, 12-month summation of the coating usage figures.
2. The maximum annual cleanup material usage from emissions units K002 (Bay Area 1 Spray Booth), K005 (Bay Area 10 Spray Booth) and K009 (Bay Area 5 Coating Line) shall not exceed 10,300 gallons, based upon a rolling, 12-month summation of the cleanup material usage figures.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the emissions units identified in term and condition A.2.d:
 - a. The name and identification number of each coating employed.
 - b. The individual HAP* content for each HAP of each coating, in pounds of

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- 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 number of each cleanup material employed.
 - f. The individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup 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 cleanup material employed.
 - i. The total individual HAP usage** for each HAP from all coatings and cleanup materials employed, in pounds or tons [for each HAP, the sum of (b) times (d) for all coatings plus the sum of (f) times (h) for all cleanup materials, and divided by 2,000 pounds per ton if the units are in tons].
 - j. The total combined HAP usage** from all coatings and cleanup materials employed, in pounds or tons [the sum of (c) times (d) for all coatings plus the sum of (g) times (h) for all cleanup materials, and divided by 2,000 pounds per ton if the units are in tons].
 - k. The updated rolling, 12-month summation of usage for each individual HAP**, in tons. This shall include the information for the current month and the preceding eleven calendar months.
 - l. The updated rolling, 12-month summation of usage for the total combined HAPs**, in tons. This shall include the information for the current month and the preceding eleven calendar months.

* 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.

** This assumes the amount of HAPs used is equivalent to the amount of HAPs that will

Emissions Unit ID: **K002**

evaporate and be emitted.

2. The permittee shall collect and record the following information each month for emissions units K002 (Bay Area 1 Spray Booth), K005 (Bay Area 10 Spray Booth) and K009 (Bay Area 5 Coating Line):
 - a. The name and identification number of each coating and cleanup material employed.
 - b. The VOC content for each coating, in pounds of VOC per gallon of coating, excluding water and exempt solvents.
 - c. The VOC content for each cleanup material, in pounds of VOC per gallon of cleanup material.
 - d. The number of gallons of each coating employed, excluding water and exempt solvents.
 - e. The number of gallons of each cleanup material employed.
 - f. the total VOC emissions in pounds or tons [summation of (b x d) for all coatings plus (c x e) and divided by 2,000 pounds per ton if the units are in tons].
 - g. the updated rolling, 12-month summation of the coating and cleanup material usage, in gallons. This shall include the information for the current month and the preceding eleven calendar months.
 - h. The updated rolling, 12-month summation of the total VOC emissions, in tons. This shall include the information for the current month and the preceding eleven calendar months.
3. The permit to install for emissions units K002, K005 and K009 were evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model(or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

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Pollutant: Toluene

TLV (ug/m3): 188,400

Maximum Hourly Emission Rate (lbs/hr): 35.0 (emissions unit K002)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): $1467 + 202 + 301 = 1970$

MAGLC (ug/m3): 4,486

Physical changes to or in the method of operation of the emissions unit after it's installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

Emissions Unit ID: **K002**

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP emission limitations outlined in term and condition A.2.d. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of noncomplying coatings and or cleanup materials (i.e., the VOC content limitations in terms A.2.b and A.2.c). The notification shall include a copy of such records and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.
3. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month VOC emissions limitation outlined in term and condition A.2.e. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
4. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month coating and cleanup material usage limitations outlined in terms and condition B.1 and B.2. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31,

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April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).

5. The permittee shall submit annual reports which specify the total VOC emissions from emissions units K002, K005, and K009 for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Emission Limitation:
Volatile organic compound emissions shall not exceed 35.0 pounds per hour.

Applicable Compliance Method:

Compliance shall be determined by multiplying the maximum coating usage of 10 gallons per hour by the maximum VOC content limit of 3.5 pounds of VOC per gallon.

2. Emission Limitations:
The VOC content, as applied, of each coating employed in this emissions unit shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.

The VOC content of each cleanup material employed in this emissions unit shall not exceed 7.0 pounds of VOC per gallon of cleanup material, as applied.

Applicable Compliance Method:

USEPA Methods 24 and 24A shall be used to determine the VOC contents for the coatings and cleanup materials employed in this emissions unit. 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.

3. Compliance with the HAP usage limitations specified in term and condition A.2.d shall be determined by the required record keeping in term and condition C.1.
4. Compliance with the VOC emission limitations specified in term and condition A.2.e shall be determined by the required record keeping in term and condition C.2.

Emissions Unit ID: **K002**

5. Compliance with the coating and cleanup material usage limitations as specified in term and conditions B.1 and B.2 shall be determined by the required record keeping in term and condition C.2.

F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A, B, C.1, C.2 D, and E.

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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 - (K005) - Bay Area 10 Spray Booth

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>Volatile Organic Compound (VOC) emissions shall not exceed 35.0 pounds per hour from coating only.</p> <p>See term and condition A.2.c.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(1)(c) and 3745-31-05(C).</p>
OAC rule 3745-21-09(U)(1)(c)	See term and condition A.2.b.
OAC rule 3745-31-05(C)	See terms and conditions A.2.d, A.2.e, B.1, and B.2.

2. Additional Terms and Conditions

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the VOC content, usage, and emission limitations.
- 2.b The VOC content, as applied, of each coating employed in this emissions unit shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.
- 2.c The VOC content of each cleanup material employed in this emissions unit shall not exceed 7.0 pounds of VOC per gallon of cleanup material, as applied.
- 2.d The total usage of hazardous air pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from K002 (Bay Area 1 Spray Booth), K005 (Bay Area 10 Spray Booth), K009 (Bay Area 5 Coating Line), P001 (Solvent Wipe and Spray Cleaning) and any registration status and/or permit

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exempt emissions units, shall not exceed 9.9 TPY* for any single HAP, as a rolling, 12-month summation and 24.9 TPY* for any combination of HAPs, as a rolling, 12-month summation.

*This assumes that the amount of HAPs used is equivalent to the amount of HAPs that will evaporate and be emitted.

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

- 2.e** The volatile organic compound (VOC) emissions from emissions units K002 (Bay Area 1 Spray Booth), K005 (Bay Area 10 Spray Booth), and K009 (Bay Area 5 Coating Line) shall not exceed 57.93 TPY based upon a rolling, 12-month summation.

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

- 2.f** The hourly emission limitation outlined in term A.1. is based upon the emissions unit's potential to emit. Therefore, no records are required to demonstrate compliance with this limitation.

B. Operational Restrictions

1. The maximum annual coating usage from emissions units K002 (Bay Area 1 Spray Booth), K005 (Bay Area 10 Spray Booth) and K009 (Bay Area 5 Coating Line) shall not exceed 12,500 gallons, excluding water and exempt solvents based upon a rolling, 12-month summation of the coating usage figures.
2. The maximum annual cleanup material usage from emissions units K002 (Bay Area 1 Spray Booth), K005 (Bay Area 10 Spray Booth) and K009 (Bay Area 5 Coating Line) shall not exceed 10,300 gallons, based upon a rolling, 12-month summation of the cleanup material usage figures.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the emissions units identified in term and condition A.2.d:
 - a. The name and identification number of each coating employed.

- b. The individual 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 number of each cleanup material employed.
- f. The individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup 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 cleanup material employed.
- i. The total individual HAP usage** for each HAP from all coatings and cleanup materials employed, in pounds or tons [for each HAP, the sum of (b) times (d) for all coatings plus the sum of (f) times (h) for all cleanup materials, and divided by 2,000 pounds per ton if the units are in tons].
- j. The total combined HAP usage** from all coatings and cleanup materials employed, in pounds or tons [the sum of (c) times (d) for all coatings plus the sum of (g) times (h) for all cleanup materials, and divided by 2,000 pounds per ton if the units are in tons].
- k. The updated rolling, 12-month summation of usage for each individual HAP**, in tons. This shall include the information for the current month and the preceding eleven calendar months.
- l. The updated rolling, 12-month summation of usage for the total combined HAPs**, in tons. This shall include the information for the current month and the preceding eleven calendar months.

* 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.

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** This assumes the amount of HAPs used is equivalent to the amount of HAPs that will evaporate and be emitted.

2. The permittee shall collect and record the following information each month for emissions units K002 (Bay Area 1 Spray Booth), K005 (Bay Area 10 Spray Booth) and K009 (Bay Area 5 Coating Line):
 - a. The name and identification number of each coating and cleanup material employed.
 - b. The VOC content for each coating, in pounds of VOC per gallon of coating, excluding water and exempt solvents.
 - c. The VOC content for each cleanup material, in pounds of VOC per gallon of cleanup material.
 - d. The number of gallons of each coating employed, excluding water and exempt solvents.
 - e. The number of gallons of each cleanup material employed.
 - f. the total VOC emissions in pounds or tons [summation of (b x d) for all coatings plus (c x e) and divided by 2,000 pounds per ton if the units are in tons].
 - g. the updated rolling, 12-month summation of the coating and cleanup material usage, in gallons. This shall include the information for the current month and the preceding eleven calendar months.
 - h. The updated rolling, 12-month summation of the total VOC emissions, in tons. This shall include the information for the current month and the preceding eleven calendar months.
3. The permit to install for emissions units K002, K005 and K009 were evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model(or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

Emissions Unit ID: **K005**

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene

TLV (ug/m3): 188,400

Maximum Hourly Emission Rate (lbs/hr): 35.0 (emissions unit K005)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): $1467 + 202 + 301 = 1970$

MAGLC (ug/m3): 4,486

Physical changes to or in the method of operation of the emissions unit after it's installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

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The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP emission limitations outlined in term and condition A.2.d. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of noncomplying coatings and or cleanup materials (i.e., the VOC content limitations in terms A.2.b and A.2.c). The notification shall include a copy of such records and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.
3. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month VOC emissions limitation outlined in term and condition A.2.e. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
4. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month coating and cleanup material usage

Emissions Unit ID: **K005**

limitations outlined in terms and condition B.1 and B.2. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).

5. The permittee shall submit annual reports which specify the total VOC emissions from emissions units K002, K005, and K009 for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Emission Limitation:
Volatile organic compound emissions shall not exceed 35.0 pounds per hour.

Applicable Compliance Method:

Compliance shall be determined by multiplying the maximum coating usage of 10 gallons per hour by the maximum VOC content limit of 3.5 pounds of VOC per gallon.

2. Emission Limitations:
The VOC content, as applied, of each coating employed in this emissions unit shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.

The VOC content of each cleanup material employed in this emissions unit shall not exceed 7.0 pounds of VOC per gallon of cleanup material, as applied.

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Applicable Compliance Method:

USEPA Methods 24 and 24A shall be used to determine the VOC contents for the coatings and cleanup materials employed in this emissions unit. 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.

3. Compliance with the HAP usage limitations specified in term and condition A.2.d shall be determined by the required record keeping in term and condition C.1.
4. Compliance with the VOC emission limitations specified in term and condition A.2.e shall be determined by the required record keeping in term and condition C.2.
5. Compliance with the coating and cleanup material usage limitations as specified in term and conditions B.1 and B.2 shall be determined by the required record keeping in term and condition C.2.

F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A, B, C.1, C.2 D, and E.

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 - (K009) - Bay Area 5 Coating Line

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Volatile Organic Compound (VOC) emissions shall not exceed 35.0 pounds per hour from coating only. The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(1)(i) and 3745-31-05(C).
OAC rule 3745-21-09(U)(1)(c)	See term and condition A.2.b.
OAC rule 3745-31-05(C)	See terms and conditions A.2.d, A.2.e, B.1, and B.2.

2. Additional Terms and Conditions

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the VOC content, usage, and emission limitations.
- 2.b The VOC content, as applied, of each coating employed in this emissions unit shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.
- 2.c The VOC content of each cleanup material employed in this emissions unit shall not exceed 7.0 pounds of VOC per gallon of cleanup material, as applied.
- 2.d The total usage of hazardous air pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from K002 (Bay Area 1 Spray Booth), K005 (Bay Area 10 Spray Booth), K009 (Bay Area 5 Coating Line), P001 (Solvent Wipe and Spray Cleaning) and any registration status and/or permit exempt emissions units, shall not exceed 9.9 TPY* for any single HAP, as a rolling, 12-month summation and 24.9 TPY* for any combination of HAPs, as a rolling, 12-month summation.

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*This assumes that the amount of HAPs used is equivalent to the amount of HAPs that will evaporate and be emitted.

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

- 2.e** The volatile organic compound (VOC) emissions from emissions units K002 (Bay Area 1 Spray Booth), K005 (Bay Area 10 Spray Booth), and K009 (Bay Area 5 Coating Line) shall not exceed 57.93 TPY based upon a rolling, 12-month summation.

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

- 2.f** The hourly emission limitation outlined in term A.1. is based upon the emissions unit's potential to emit. Therefore, no records are required to demonstrate compliance with this limitation.

B. Operational Restrictions

1. The maximum annual coating usage from emissions units K002 (Bay Area 1 Spray Booth), K005 (Bay Area 10 Spray Booth) and K009 (Bay Area 5 Coating Line) shall not exceed 12,500 gallons, excluding water and exempt solvents based upon a rolling, 12-month summation of the coating usage figures.
2. The maximum annual cleanup material usage from emissions units K002 (Bay Area 1 Spray Booth), K005 (Bay Area 10 Spray Booth) and K009 (Bay Area 5 Coating Line) shall not exceed 10,300 gallons, based upon a rolling, 12-month summation of the cleanup material usage figures.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the emissions units identified in term and condition A.2.d:
 - a. The name and identification number of each coating employed.
 - b. The individual HAP* content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied.

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- 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 number of each cleanup material employed.
- f. The individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup 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 cleanup material employed.
- i. The total individual HAP usage** for each HAP from all coatings and cleanup materials employed, in pounds or tons [for each HAP, the sum of (b) times (d) for all coatings plus the sum of (f) times (h) for all cleanup materials, and divided by 2,000 pounds per ton if the units are in tons].
- j. The total combined HAP usage** from all coatings and cleanup materials employed, in pounds or tons [the sum of (c) times (d) for all coatings plus the sum of (g) times (h) for all cleanup materials, and divided by 2,000 pounds per ton if the units are in tons].
- k. The updated rolling, 12-month summation of usage for each individual HAP**, in tons. This shall include the information for the current month and the preceding eleven calendar months.
- l. The updated rolling, 12-month summation of usage for the total combined HAPs**, in tons. This shall include the information for the current month and the preceding eleven calendar months.

* 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.

** This assumes the amount of HAPs used is equivalent to the amount of HAPs that will evaporate and be emitted.

Emissions Unit ID: **K009**

2. The permittee shall collect and record the following information each month for emissions units K002 (Bay Area 1 Spray Booth), K005 (Bay Area 10 Spray Booth) and K009 (Bay Area 5 Coating Line):
 - a. The name and identification number of each coating and cleanup material employed.
 - b. The VOC content for each coating, in pounds of VOC per gallon of coating, excluding water and exempt solvents.
 - c. The VOC content for each cleanup material, in pounds of VOC per gallon of cleanup material.
 - d. The number of gallons of each coating employed, excluding water and exempt solvents.
 - e. The number of gallons of each cleanup material employed.
 - f. the total VOC emissions in pounds or tons [summation of (b x d) for all coatings plus (c x e) and divided by 2,000 pounds per ton if the units are in tons].
 - g. the updated rolling, 12-month summation of the coating and cleanup material usage, in gallons. This shall include the information for the current month and the preceding eleven calendar months.
 - h. The updated rolling, 12-month summation of the total VOC emissions, in tons. This shall include the information for the current month and the preceding eleven calendar months.
3. The permit to install for emissions units K002, K005 and K009 were evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model(or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

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Pollutant: Toluene

TLV (ug/m3): 188,400

Maximum Hourly Emission Rate (lbs/hr): 35.0 (emissions unit K009)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): $1467 + 202 + 301 = 1970$

MAGLC (ug/m3): 4,486

Physical changes to or in the method of operation of the emissions unit after it's installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it

Emissions Unit ID: **K009**

conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP emission limitations outlined in term and condition A.2.d. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of noncomplying coatings and or cleanup materials (i.e., the VOC content limitations in terms A.2.b and A.2.c). The notification shall include a copy of such records and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.
3. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month VOC emissions limitation outlined in term and condition A.2.e. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
4. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month coating and cleanup material usage limitations outlined in terms and condition B.1 and B.2. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar

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quarters (October through December, January through March, April through June and July through September, respectively).

5. The permittee shall submit annual reports which specify the total VOC emissions from emissions units K002, K005, and K009 for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Emission Limitation:
Volatile organic compound emissions shall not exceed 35.0 pounds per hour.

Applicable Compliance Method:

Compliance shall be determined by multiplying the maximum coating usage of 10 gallons

per hour by the maximum VOC content limit of 3.5 pounds of VOC per gallon.

2. Emission Limitations:
The VOC content, as applied, of each coating employed in this emissions unit shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.

The VOC content of each cleanup material employed in this emissions unit shall not exceed 7.0 pounds of VOC per gallon of cleanup material, as applied.

Emissions Unit ID: **K009****Applicable Compliance Method:**

USEPA Methods 24 and 24A shall be used to determine the VOC contents for the coatings and cleanup materials employed in this emissions unit. 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.

3. Compliance with the HAP usage limitations specified in term and condition A.2.d shall be determined by the required record keeping in term and condition C.1.
4. Compliance with the VOC emission limitations specified in term and condition A.2.e shall be determined by the required record keeping in term and condition C.2.
5. Compliance with the coating and cleanup material usage limitations as specified in term and conditions B.1 and B.2 shall be determined by the required record keeping in term and condition C.2.

F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A, B, C.1, C.2 D, and E..

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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 - (P001) - Solvent Wipe and Spray Cleaning

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>Volatile Organic Compound (VOC) emissions shall not exceed 70.0 pounds per hour.</p> <p>See term and condition A.2.b.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G) and 3745-31-05(C).</p>
OAC rule 3745-21-07(G)	See term and condition B.2.
OAC rule 3745-31-05(C)	<p>Volatile Organic Compounds (VOC) emissions shall not exceed 17.5 tons per year based upon a rolling, 12-month summation.</p> <p>See terms and conditions A.2.c and B.1.</p>

2. Additional Terms and Conditions

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the VOC content, usage, and emission limitations.
- 2.b The Volatile Organic Compound (VOC) content of each cleanup material employed in this emissions unit shall not exceed 7.0 pounds of VOC per gallon of cleanup material.
- 2.c The total usage of hazardous air pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from K002 (Bay Area 1 Spray Booth), K005 (Bay Area 10 Spray Booth), K009 (Bay Area 5 Coating Line), P001 (Solvent Wipe and Spray Cleaning) and any registration status and/or permit exempt emissions units, shall not exceed 9.9 TPY* for any single HAP, as a

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rolling, 12-month summation and 24.9 TPY* for any combination of HAPs, as a rolling, 12-month summation.

*This assumes that the amount of HAPs used is equivalent to the amount of HAPs that will evaporate and be emitted.

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

- 2.d** The hourly emission limitation outlined in term A.1. is based upon the emissions unit's potential to emit. Therefore, no records are required to demonstrate compliance with this limitation.

B. Operational Restrictions

1. The maximum annual cleanup material usage in this emissions unit shall not exceed 5000 gallons, based upon a rolling, 12-month summation of the cleanup material usage figures.
2. The use of photochemically reactive cleanup material as defined in OAC rule 3745-21-01(C)(5) is prohibited.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the emissions units identified in term and condition A.2.c:
 - a. The name and identification number of each coating employed.
 - b. The individual 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 number of each cleanup material employed.
 - f. The individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied.

Emissions Unit ID: **P001**

- 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 cleanup material employed.
- i. The total individual HAP usage** for each HAP from all coatings and cleanup materials employed, in pounds or tons [for each HAP, the sum of (b) times (d) for all coatings plus the sum of (f) times (h) for all cleanup materials, and divided by 2,000 pounds per ton if the units are in tons].
- j. The total combined HAP usage** from all coatings and cleanup materials employed, in pounds or tons [the sum of (c) times (d) for all coatings plus the sum of (g) times (h) for all cleanup materials, and divided by 2,000 pounds per ton if the units are in tons].
- k. The updated rolling, 12-month summation of usage for each individual HAP**, in tons. This shall include the information for the current month and the preceding eleven calendar months.
- l. The updated rolling, 12-month summation of usage for the total combined HAPs**, in tons. This shall include the information for the current month and the preceding eleven calendar months.

* 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.

** This assumes the amount of HAPs used is equivalent to the amount of HAPs that will evaporate and be emitted.

- 2. The permittee shall collect and record the following information each month for this emissions unit:
 - a. The company identification of each liquid organic cleanup material employed.
 - b. The VOC content (in pounds of VOC per gallon) of each cleanup material employed.
 - c. The number of gallons of each clean up material employed.

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- d. The total VOC emissions, in pounds [summation of (b x c) for all cleanup materials] for each calendar month.
- e. The updated rolling, 12-month summation of the cleanup material usage, in gallons.
- f. The updated rolling, 12-month summation of the VOC emissions, in tons. This shall include the information for the current month and the preceding eleven calendar months.
- g. Documentation on whether or not each organic cleanup material is a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5).

[Note: The definitions of "photochemically reactive" and "non-photochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

- 3. The permit to install for the emissions unit P001 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Aliphatic Naphtha

TLV (ug/m3): 2,840,000

Maximum Hourly Emission Rate (lbs/hr): 70.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1737

MAGLC (ug/m3): 67,619

Physical changes to or in the method of operation of the emissions unit after it's installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy"

Emissions Unit ID: **P001**

include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

Issued: To be entered upon final issuance

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of non-complying cleanup materials (i.e. the VOC content in term A.2.b). The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.
2. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP emission limitations outlined in term and condition A.2.c. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
3. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month VOC emissions limitation outlined in term and condition A.1. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
4. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month cleanup material usage limitation outlined in term and condition B.1. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
5. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive material (as defined in OAC rule 3745-21-01(C)(5)) was employed in this emissions unit. This report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of organic compound emissions emitted each such day. This report shall be submitted to the Hamilton County Department of Environmental Services within 30 days after the exceedance occurs.
6. The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Emission Limitation:
Volatile organic compound emissions shall not exceed 70.0 pounds per hour.

Applicable Compliance Method:

Compliance shall be determined by multiplying the maximum cleanup material usage of 10 gallons per hour by the maximum VOC content limit of 7.0 pounds of VOC per gallon.

2. Emission Limitation:
The VOC content of each cleanup material employed in this emissions unit shall not exceed 7.0 pounds of VOC per gallon of cleanup material.

Applicable Compliance Method:

Formulation data or U.S. EPA method 24 (for cleanup materials) shall be used to determine the VOC contents of the cleanup materials, employed in the emissions units.

3. Compliance with the HAP usage limitations specified in term and condition A.2.c. shall be determined by the required record keeping in term and condition C.1.
4. Compliance with the VOC emission limitations in term A.1 shall be determined by the required record keeping in term and condition C.2.
5. Compliance with the cleanup material usage limitations as specified in term and condition B.1 shall be determined by the required record keeping in term and condition C.2.

F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A, B, C.1, C.2, D, E.