



State of Ohio Environmental Protection Agency

Street Address:

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

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

Mailing Address:

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

**RE: DRAFT PERMIT TO INSTALL
BUTLER COUNTY
Application No: 14-05123**

CERTIFIED MAIL

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

DATE: 6/5/2001

CTL Aerospace Inc.
LeRoy Euvrard
2230 Burnet Avenue
Cinainnati, OH

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 of 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 **\$200** 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.

Very truly yours,

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

cc: USEPA

HCDES
KY

Ohio-Kentucky-Indiana Reg Council of Gov
IN



Permit To Install

Issue Date: To be entered upon final issuance

Terms and Conditions

Effective Date: To be entered upon final issuance

DRAFT PERMIT TO INSTALL 14-05123

Application Number: 14-05123

APS Premise Number: 1409000646

Permit Fee: **To be entered upon final issuance**

Name of Facility: CTL Aerospace Inc.

Person to Contact: LeRoy Euvrard

Address: 2230 Burnet Avenue
Cincinnati, OH 45219

Location of proposed air contaminant source(s) [emissions unit(s)]:

**5616 Spellmire Drive
Union Township, Ohio**

Description of proposed emissions unit(s):

Modification of PTI so that a variety of cleanup solvents can be used, not just MEK.

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

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

3. Records Retention Requirements

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

4. Inspections and Information Requests

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

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

5. Scheduled Maintenance/Malfunction Reporting

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

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

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

9. Construction of New Sources(s)

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

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

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

10. Public Disclosure

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

11. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit to Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

12. Best Available Technology

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

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

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

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PTI Application: 14-05123

Issued: To be entered upon final issuance

Facility ID: 1409000646

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

14. Construction Compliance Certification

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

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	29.4

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P009 - Solvent wipe cleaning operation	OAC rule 3745-31-05(A)(3)	205 lbs OC/day, 29.4 TPY OC The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2) and OAC rule 3745-31-05(D).
	OAC rule 3745-31-05(D)	See term A.2.b
	OAC rule 3745-21-07(G)(2)	8 lbs OC/hr, 40 lbs OC/day when using photochemically reactive materials

2. Additional Terms and Conditions

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emission limits and compliance with the Air Toxics Policy.
- 2.b The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance with the rolling, 12-month summation limit upon issuance of the permit.

- 2.c On any day when using(employing) photochemically reactive materials [as defined in OAC rule 3745-21-01(C)(5)] for solvent wipe cleaning, the organic compound (OC) emissions from all organic materials employed that day shall not exceed 8 pounds of OC per hour and 40 pounds of OC per day.

- 2.d** On any day when not using photochemically reactive materials [as defined in OAC rule 3745-21-01(C)(5)] for solvent wipe cleaning, the OC emissions shall not exceed 205 pounds of OC per day.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. The company identification for each organic cleanup solvent employed.
 - b. A record of each organic cleanup solvent employed in this emissions unit indicating, whether or not the liquid organic material is photochemically reactive as identified in OAC rule 3745-21-01(C)(5).
 - c. A statement for each day which says whether a photochemically reactive material cleanup solvent was employed in this emissions unit.
 - d. The number of gallons of each organic cleanup solvent employed.
 - e. The organic compound content of each organic cleanup solvent employed, in pounds per gallon.
 - f. The total organic compound emission rate for all organic cleanup solvents employed, in pounds per day [calculated by taking the sum of (d) times (e) for each organic cleanup solvent employed].
 - g. The total number of hours the emissions unit was in operation.
 - h. The total organic compound emission rate for all organic cleanup solvents employed, in pounds per hour [calculated by taking (e) divided (f)]when using a photochemically reactive material.

In addition, these records shall be summarized at the end of each year to calculate the annual organic compound emissions.

2. The permittee shall collect and record the following information each month for the entire facility:
 - a. The name and identification number of each coating, as applied.
 - 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 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 emissions for each HAP from all coatings and cleanup materials employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each coating and the sum of (f) times (h) for each cleanup material].
- j. The total combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material].
- k. The updated rolling, 12-month summation for individual HAP emissions for each HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
- l. The updated rolling, 12-month summation for total combined HAP emissions, in pounds or 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 Ohio EPA field office or local air agency contact. This information does not have to be kept on a line-by-line basis.

- 3. The permit to install for this emissions unit (P009) 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: Methyl Ethyl Ketone

TLV (ug/m3): 589,800

Maximum Hourly Emission Rate (lbs/hr): 9.26

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 691.2

MAGLC (ug/m3): 14,043

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 with the above changes, the Ohio EPA will not consider the change(s) to be a “modification” under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], 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 it’s evaluation and determination that the changed emissions unit still satisfies the “Air Toxic Policy”; and

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Facility ID: 1409000646

Emissions Unit ID: P009

- 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 Director (the appropriate Ohio EPA District Office or the local air agency) of any exceedance of the HAP emissions limitations set forth in this Permit to Install. The permittee shall submit annual reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year. If no exceedances occurred during the reporting period then a report is required stating so.
2. The permittee shall submit annual reports which specify the total organic compounds emissions from emissions unit P009 for the previous calendar year. These reports shall be submitted by January 31 of each year.
3. The permittee shall submit a deviation report identifying each day during which any photochemically reactive material [as defined in OAC 3745-21-01(C)(5)] was employed in this emissions unit and the average hourly OC emission rate exceeded 8 pounds per hour.
4. The permittee shall submit a deviation report identifying each day during which any photochemically reactive material [as defined in OAC 3745-21-01(C)(5)] was employed in this emissions unit and the OC emission rate exceeded 40 pounds per day.
5. The permittee shall submit a deviation report identifying each day during which non-photochemically reactive materials were employed in this emissions unit and the OC emission rate exceeded 205 pounds per day.
6. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emission limitations outlined in Term A.1 shall be demonstrated by the record keeping in Term C.1.
2. Compliance with the emission limitations outlined in Term A.2.b shall be demonstrated by the record keeping in Term C.2.

CTL Aerospace Inc.

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Emissions Unit ID: P009

F. Miscellaneous Requirements

1. The terms and conditions listed in this permit to install shall supercede all the air pollution control requirements for this emission unit contained in permit to install 14-04514 as issued on September 10, 1998.
2. The following terms and conditions of this permit are federally enforceable: A., C.1., C.2., D and E.

NEW SOURCE REVIEW FORM B

PTI Number: 14-05123

Facility ID: 1409000646

FACILITY NAME CTL Aerospace Inc.

FACILITY DESCRIPTION Modification of PTI so that a variety of cleanup solvents can be used, not just MEK. CITY/TWP Union Township

SIC CODE 3724 SCC CODE 30800901 EMISSIONS UNIT ID P009

EMISSIONS UNIT DESCRIPTION Solvent Wiping

DATE INSTALLED 1996

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	attainment	75 lbs/day	9.9	205 lbs/day	29.4
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Emissions limitations and compliance with air toxics policy.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$NA

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to containinants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES NO

IDENTIFY THE AIR CONTAMINANTS: Methyl Ethyl Ketone

NEW SOURCE REVIEW FORM B

PTI Number: 14-05123

Facility ID: 1409000646

FACILITY NAME CTL Aerospace Inc.

FACILITY DESCRIPTION	Modification of PTI so that a variety of cleanup solvents can be used, not just MEK.	CITY/TWP	Union Township
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Ohio EPA Permit to Install Information Form Please describe below any documentation which is being submitted with this recommendation (must be sent the same day). Electronic items should be submitted with the e-mail transmitting the PTI terms, and in software that CO can utilize. If mailing any hard copy, this section must be printed as a cover page. All items must be clearly labeled indicating the PTI name and number. Submit **hard copy items to Pam McGraner**, AQM&P, DAPC, Central Office, and electronic files to airpti@epa.state.oh.us

<i>Please fill out the following. If the checkbox does not work, replace it with an 'X'</i>	<u>Electronic</u>	<u>Additional information</u> File Name Convention (your PTI # plus this letter)	<u>Hard Copy</u>	<u>None</u>
<u>Calculations (required)</u>	<input type="checkbox"/>	0000000c.wpd	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<u>Modeling form/results</u>	<input type="checkbox"/>	0000000s.wpd	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<u>PTI Application (complete or partial)*</u>	<input type="checkbox"/>	0000000a.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>BAT Study</u>	<input type="checkbox"/>	0000000b.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>Other/misc.</u>	<input type="checkbox"/>	0000000t.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>

* Mandatory for netting, PSD, nonattainment NSR, 112(g), 21-07(G)(9)(g) and 21-09(U)(2)(f) - 2 complete copies.

Please complete (see comment bubble to the left for additional instructions):

NSR Discussion**PERMIT REVIEW NARRATIVE**

PTI 14-05123

CTL Aerospace, Inc.
5616 Spellmire Drive
Union Township, Ohio 45246
Facility No. 1409000646

This PTI Application is for a Modification to supercede the previous Permit To Install, PTI 14-04514 issued to CTL Aerospace September 10, 1998. According to their cover letter, this PTI is a response to an NOV from Hamilton County on March 2, 2001 and is an attempt to reduce HAP emissions. Their assumption was that only one HAP, MEK, would be used for solvent cleaning and PTI 14-04514 allowed just 9.9 tons total OCs to ensure that 10 TPY of this HAP was not exceeded. The facility has received several NOVs for exceedances of daily OC limitations.

The facility maintains that using solvents other than MEK requires considerably more gallons of solvents and they have requested an OC increase to 29.4 TPY.

PTI Application 14-05123 involves only the solvent wiping operation at CTL Aerospace, which is emissions unit P009. The facility uses disposable cotton rags to wipe clean aerospace tools and fixtures. The applicable regulations are 3745-31-05(A)(3), 3745-31-05(D) and 3745-21-07(G)(2). No photochemically reactive materials were allowed in the previous permit to install. The modification asks for the use of photochemically reactive materials. Per the facility they may have production requirements from the military which rigidly specify the use of photochemically reactive

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NEW SOURCE REVIEW FORM B

PTI Number: 14-05123

Facility ID: 1409000646

FACILITY NAME CTL Aerospace Inc.

FACILITY DESCRIPTION	Modification of PTI so that a variety of cleanup solvents can be used, not just MEK.	CITY/TWP	Union Township
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materials.

Best Available Technology is satisfied by emissions limitations and compliance with air toxics policy.

Approval of the PTI Application is recommended.

Permit Fee: \$200

Prepared By: Michael Ploetz

Date Prepared: April 3, 2001

Please complete for these type permits (For PSD/NSR Permit, place mouse over this text):

Synthetic Minor Determination and/or **Netting Determination**
Permit To Install **ENTER PTI NUMBER HERE**

A. Emissions Units Description

The Permit to Install (PTI 14-05123) covers Emissions unit P009 - Solvent Wipe Cleaning Operation. The permittee has applied for a federally enforceable synthetic minor PTI for HAP emissions.

B. Facility Emissions and Attainment Status

CTL Aerospace, Inc. has a paint spray booth (emissions unit R003) which is limited to 7.3 TPY OC emissions and a blowtherm repair booth (emissions unit R005) which is limited to 19.5 TPY OC emissions. This emissions unit (P009) will be limited to 29.4 TPY OCs. This will take the total allowable OC emissions for the facility to 56.2 TPY. CTL Aerospace, Inc. is located in Butler County which is designated an attainment area for all criteria pollutants. The facility is not a major source for OCs, but is a potential major source for HAP emissions. The permittee requests to incorporate federally enforceable limitations in this PTI limiting HAP emissions from the entire facility to less than 10 TPY as a rolling, 12-month summation of any single HAP and less than 25 TPY as a rolling, 12-month summation for combined HAPs.

C. Source Emissions

Potential emissions were calculated based on maximum capacity and 8760 hrs/yr of operation. The potential HAP emissions from this emissions unit (P009) in the absence of a federally enforceable PTI would be 40.56 TPY of a single HAP and 40.56 TPY of combined HAPs. The emission limitations outlined in this PTI limit facility-wide HAPs emissions to less than 10 TPY as a rolling, 12-month summation for any single HAP and less than 25 TPY as a rolling, 12-month summation for combined HAPs. The facility will keep records and

NEW SOURCE REVIEW FORM B

PTI Number: 14-05123

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FACILITY NAME CTL Aerospace Inc.

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submit reports as described in the PTI to ensure compliance with the emission limits.

D. Conclusion

The terms and conditions in this PTI will limit HAP emissions from the entire facility to less than 10 TPY as a rolling, 12-month summation of any single HAP and less than 25 TPY as a rolling, 12-month summation for combined HAPs. The permittee will maintain records and submit reports as outlined in the additional terms and conditions for all emissions units to demonstrate compliance. As the increase in allowable emissions from this emissions units by CTL Aerospace, Inc. constitutes a minor modification to a minor facility, the emissions offsets policy and PSD do not apply.

PLEASE PROVIDE ADDITIONAL NOTES OR COMMENTS AS NECESSARY:

NONE

Please complete:

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

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	29.4

NEW SOURCE REVIEW FORM B

PTI Number: 14-05123

Facility ID: 1409000646

FACILITY NAME CTL Aerospace Inc.

FACILITY DESCRIPTION	Modification of PTI so that a variety of cleanup solvents can be used, not just MEK.	CITY/TWP	Union Township
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