



State of Ohio Environmental Protection Agency

Street Address:

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

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

Mailing Address:

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

**RE: FINAL PERMIT TO INSTALL
WARREN COUNTY
Application No: 14-05427**

CERTIFIED MAIL

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

DATE: 9/18/2003

Harris Corporation Broadcast Division
Larry Gesell
4393 Digital Way
Mason, OH 45040-0000

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

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.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

Sincerely,

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

cc: USEPA

HCDES



**Permit To Install
Terms and Conditions**

**Issue Date: 9/18/2003
Effective Date: 9/18/2003**

FINAL PERMIT TO INSTALL 14-05427

Application Number: 14-05427
APS Premise Number: 1483090442
Permit Fee: **\$400**
Name of Facility: Harris Corporation Broadcast Division
Person to Contact: Larry Gesell
Address: 4393 Digital Way
Mason, OH 45040-0000

Location of proposed air contaminant source(s) [emissions unit(s)]:
**4240 Irwin Simpson Road
Mason, Ohio**

Description of proposed emissions unit(s):
Installation of one (1) new metal and wood components paint spray booth and one (1) contact adhesive spray hood for laminated surfaces.

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

The permittee shall submit required reports in the following manner:

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

3. Records Retention Requirements

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

4. Inspections and Information Requests

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

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

5. Scheduled Maintenance/Malfunction Reporting

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

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

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

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

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

10. Public Disclosure

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

11. Applicability

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

12. Best Available Technology

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

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

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>
VOC/OC	13.32

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>
K001 - paint spray booth for miscellaneous metal parts using compliance coatings and non-metals parts using non-PRM coatings	OAC rule 3745-31-05(A)(3)	for metal parts coating: 8.05 lbs VOC emissions/hour 3.50 TPY VOC emissions The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1)(d). See Term B.1. for non-metal parts coating: 10.7 lbs VOC emissions/hour 3.24 TPY VOC emissions See Terms A.2.b. and B.2. for cleanup operations: 1.04 TPY VOC emissions See Terms A.2.c. and B.3.
	OAC rule 3745-21-09(U)(1)(d)	See Term A.2.a.

2. Additional Terms and Conditions

- 2.a For the coating of metal parts, the maximum VOC content of any coating employed in emissions unit K001 shall not exceed 3.5 lbs VOC per gallon of coating, as applied, excluding water and exempt solvents.
- 2.b For the coating of non-metal parts, the maximum VOC content of any coating employed in emissions unit K001 shall not exceed 5.4 lbs VOC per gallon of coating, as applied.
- 2.c For cleanup operations, the maximum VOC content of any cleanup material employed in emissions unit K001 shall not exceed 6.9 lbs VOC per gallon of cleanup material, as applied.
- 2.d The hourly emission limitations outlined are based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with these limits. The emissions unit employs compliance coatings for metal parts coating and does not employ PRM coatings for non-metal parts coating. Therefore, no daily records are required to demonstrate compliance.
- 2.e Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the usage rate limitations, the VOC content limitations, the VOC emissions limitations and compliance with the Ohio EPA Air Toxics Policy.

B. Operational Restrictions

- 1. For the coating of metal parts, the maximum annual coating usage for emissions unit K001 shall not exceed 2000 gallons per year, as applied, excluding water and exempt solvents.
- 2. For the coating of non-metal parts, the maximum annual coating usage for emissions unit K001 shall not exceed 1200 gallons per year, as applied.
- 3. For cleanup operations, the maximum annual cleanup material usage for emissions unit K001 shall not exceed 300 gallons per year, as applied.
- 4. The permittee shall not employ coatings used for non-metal parts coating which are determined to be "photochemically reactive materials" as defined by OAC rule 3745-21-01(C)(5).

C. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall collect and record the following information each month for metal parts coating in emissions unit K001:
 - a. the name and identification number of each coating employed;
 - b. the volume, in gallons, of each coating, excluding water and exempt solvents, as applied;

- c. the total volume, in gallons, of all of the coatings, excluding water and exempt solvents, as applied;
 - d. the VOC content of each coating in lbs VOC per gallon of coating, excluding water and exempt solvents, as applied; and
 - e. the summation of the actual VOC emissions from the coating line (for each coating, b. multiplied by d. and the summation of the totals equal to lbs VOC emissions per month from metal parts coating in emissions unit K001).
2. The permittee shall collect and record the following information each month for non-metal parts coating in emissions unit K001:
- a. the name and identification number of each coating employed;
 - b. the volume, in gallons, of each coating, as applied;
 - c. the total volume, in gallons, of all of the coatings, as applied;
 - d. the VOC content of each coating in lbs VOC per gallon of coating, as applied;
 - e. the summation of the actual VOC emissions from the coating line (for each coating, b. multiplied by d. and the summation of the totals equal to lbs VOC emissions per month from non-metal parts coating in emissions unit K001); and
 - f. a record of each liquid organic material employed for non-metal parts coating indicating, whether or not the liquid organic material is photochemically reactive as identified in OAC rule 3745-21-01(C)(5).
3. The permittee shall collect and record the following information each month for the purpose of determining annual VOC emissions from cleanup operations in emissions unit K001:
- a. the name and identification of each cleanup material employed;
 - b. the volume, in gallons, of each cleanup material employed;
 - c. the VOC content of each cleanup material, in lbs VOC per gallon of cleanup material; and
 - d. the total VOC emissions from all cleanup materials employed, in pounds (for each cleanup material, b. multiplied by c. and the summation of the totals equal to lbs VOC emissions per month from cleanup operations in emissions unit K001);

Additionally, the permittee shall collect and record the following information for the purpose of determining annual VOC emissions from metal parts coating, non-metal parts coating and cleanup operations:

- e. at the calendar year's end, the summation of the actual monthly VOC emissions from metal parts coating, as calculated in section C.1.e., such that the summation of all months equals lbs VOC emissions per year x 1 Ton/2000 lbs = TPY VOC emissions;
 - f. at the calendar year's end, the summation of the actual monthly VOC emissions from non-metal parts coating, as calculated in section C.2.e., such that the summation of all months equals lbs VOC emissions per year x 1 Ton/2000 lbs = TPY VOC emissions; and
 - g. at the calendar year's end, the summation of the actual monthly VOC emissions from cleanup operations, as calculated in section C.3.d., such that the summation of all months equals lbs VOC emissions per year x 1 Ton/2000 lbs = TPY VOC emissions.
4. The permit to install for emissions units K001 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust systems, 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: 1-butanol (CAS 71-36-3)

TLV (ug/m³): 60,630

Maximum Hourly Emission Rate (lbs/hr): 1.69 lbs 1-butanol/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 726.19

MAGLC (ug/m³): 1444

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 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 in writing of any record showing that the coating line employed more than the applicable maximum coating and/or cleanup material usage limits in sections B.1. through B.3. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days after the exceedance occurs.
2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of noncomplying coatings for metal parts coating. The permittee shall also notify the Hamilton County Department of Environmental Services in writing of any record showing that a coating or cleanup material employed in the emissions unit exceeded an applicable OC content limitation in sections A.2.b. through 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 after the exceedance occurs.

3. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any record showing that a coating determined to be a "photochemically reactive material" was employed in the emissions unit for the coating of non-metal parts. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days after the occurrence.
4. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services which specify the total VOC emissions from emissions unit K001 for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Emissions Limitations

8.05 lbs VOC emissions/hour and 3.50 TPY VOC emissions for metal parts coating

Applicable Compliance Methods

Compliance with the hourly VOC emissions limitation shall be demonstrated by multiplying the actual coating application rate (gallons/hour) by the actual coating VOC content, as applied, excluding water and exempt solvents (lbs VOC/gallon) such that the product equals lbs VOC/hour.

Compliance with the annual VOC emissions limitation for metal parts coating shall be demonstrated by the recordkeeping requirement in section C.3.e.

2. Emissions Limitations

10.7 lbs VOC emissions/hour and 3.24 TPY VOC emissions for non-metal parts coating

Applicable Compliance Methods

Compliance with the hourly VOC emissions limitation shall be demonstrated by multiplying the actual coating application rate (gallons/hour) by the actual coating VOC content, as applied (lbs OC/gallon) such that the product equals lbs VOC/hour.

Compliance with the annual VOC emissions limitation for non-metal parts coating shall be demonstrated by the recordkeeping requirement in section C.3.f.

3. Emissions Limitation

1.04 TPY VOC emissions for cleanup operations

Applicable Compliance Methods

Compliance with the VOC emissions limitations for cleanup operations shall be demonstrated by the recordkeeping requirement in section C.3.g.

4. Compliance with the VOC content limitations for the coating of metal parts in section A.2.a shall be demonstrated by the record keeping requirements outlined in C.1.
5. Compliance with the VOC content limitations for the coating of non-metal parts in section A.2.b shall be demonstrated by the record keeping requirements outlined in C.2.
6. Compliance with the VOC content limitations for the cleanup material in section A.2.c shall be demonstrated by the record keeping requirements outlined in C.3.
7. USEPA methods 24 and 24A shall be used to determine the VOC content for (a) coatings and (b) flexographic and rotogravure printing lines and related coatings, respectively. If, pursuant to 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.
8. Compliance with the usage limitation in section B.1 shall be demonstrated by the record keeping in section C.1.
9. Compliance with the usage limitation in section B.2 shall be demonstrated by the record keeping in section C.2.
10. Compliance with the usage limitation in section B.3 shall be demonstrated by the record keeping in section C.3.

F. Miscellaneous Requirements

None

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>
R001 - contact adhesive spray hood for laminated surfaces using non-PRM coatings	OAC rule 3745-31-05(A)(3)	for coating operations: 12.5 lbs OC emissions/hour 4.50 TPY OC emissions See Terms A.2.a. and B.1. for cleanup operations: 1.04 TPY OC emissions See Terms A.2.b. and B.2.

2. Additional Terms and Conditions

- 2.a The maximum OC content of any coating employed in emissions unit R001 shall not exceed 5.8 lbs OC per gallon of coating, as applied.
- 2.b For cleanup operations, the maximum OC content of any cleanup material employed in emissions unit R001 shall not exceed 6.9 lbs OC per gallon of cleanup material, as applied.
- 2.c The hourly emission limitation outlined is based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with the limit. The emissions unit does not employ PRM coatings for non-metal parts coating. Therefore, no daily records are required to demonstrate compliance.
- 2.d Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the usage rate limitations, the OC content limitations, the OC emissions limitations and compliance with the Ohio EPA Air Toxics Policy.

B. Operational Restrictions

1. The maximum annual coating usage for emissions unit R001 shall not exceed 1550 gallons per year, as applied.
2. For cleanup operations, the maximum annual cleanup material usage for emissions unit R001 shall not exceed 300 gallons per year, as applied.
3. The permittee shall not employ coatings used for non-metal parts coating which are determined to be "photochemically reactive materials" as defined by OAC rule 3745-21-01(C)(5).

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for coating operations in emissions unit R001:
 - a. the name and identification number of each coating employed;
 - b. the volume, in gallons, of each coating, as applied;
 - c. the total volume, in gallons, of all of the coatings, as applied;
 - d. the OC content of each coating in lbs OC per gallon of coating, as applied;
 - e. the summation of the actual OC emissions from the coating line (for each coating, b. multiplied by d. and the summation of the totals equal to lbs OC emissions per month from coating operations in emissions unit R001); and
 - f. a record of each liquid organic material employed for non-metal parts coating indicating, whether or not the liquid organic material is photochemically reactive as identified in OAC rule 3745-21-01(C)(5).
2. The permittee shall collect and record the following information each month for the purpose of determining annual OC emissions from cleanup operations in emissions unit R001:
 - a. the name and identification of each cleanup material employed;
 - b. the volume, in gallons, of each cleanup material employed;
 - c. the OC content of each cleanup material, in lbs OC per gallon of cleanup material; and
 - d. the total OC emissions from all cleanup materials employed, in pounds (for each cleanup material, b. multiplied by c. and the summation of the totals equal to lbs OC emissions per month from cleanup operations in emissions unit R001);

Additionally, the permittee shall collect and record the following information for the purpose of determining annual OC emissions from coating operations and cleanup operations:

- e. at the calendar year's end, the summation of the actual monthly OC emissions from coating operations, as calculated in section C.1.e., such that the summation of all months equals lbs OC emissions per year x 1 Ton/2000 lbs = TPY OC emissions; and
 - f. at the calendar year's end, the summation of the actual monthly OC emissions from cleanup operations, as calculated in section C.2.d., such that the summation of all months equals lbs OC emissions per year x 1 Ton/2000 lbs = TPY OC emissions.
3. The permit to install for emissions units R001 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust systems, 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: toluene (CAS 108-88-3)

TLV (ug/m³): 188,405

Maximum Hourly Emission Rate (lbs/hr): 1.48 lbs toluene/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 846.56

MAGLC (ug/m³): 4486

Physical changes to or in the method of operation of the emissions unit after its 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
- 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 in writing of any record showing that the coating line employed more than the applicable maximum coating material usage limits in sections B.1. The permittee shall also notify the Hamilton County Department of Environmental Services in writing of any monthly record showing that the coating line employed more than the applicable maximum cleanup material usage limit in section B.2. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days after the exceedance occurs.
2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any record showing that a coating or cleanup material employed in the emissions unit exceeded an applicable OC content limitations in sections A.2.a. or 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 after the exceedance occurs.
3. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any record showing that a coating determined to be a "photochemically reactive material" was employed in the emissions unit. The notification shall include a copy of such record and shall be

sent to the Hamilton County Department of Environmental Services within 30 days after the occurrence.

4. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services which specify the total OC emissions from emissions unit R001 for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Emissions Limitations

12.5 lbs OC emissions/hour and 4.50 TPY OC emissions for coating operations

Applicable Compliance Methods

Compliance with the hourly OC emissions limitation shall be demonstrated by multiplying the actual coating application rate (gallons/hour) by the actual coating OC content, as applied (lbs OC/gallon) such that the product equals lbs OC/hour.

Compliance with the annual OC emissions limitation for coating operations shall be demonstrated by the recordkeeping requirement in section C.2.e.

2. Emissions Limitation

1.04 TPY OC emissions for cleanup operations

Applicable Compliance Methods

Compliance with the OC emissions limitations for cleanup operations shall be demonstrated by the recordkeeping requirement in section C.2.f.

3. Compliance with the OC content limitations for coatings shall be demonstrated by the record keeping requirements outlined in C.1.
4. Compliance with the OC content limitations for the cleanup material shall be demonstrated by the record keeping requirements outlined in C.2.
5. USEPA methods 24 and 24A shall be used to determine the VOC content for (a) coatings and (b) flexographic and rotogravure printing lines and related coatings, respectively. If, pursuant to 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

6. Compliance with the usage limitation in section B.1 shall be demonstrated by the record keeping in section C.1.
7. Compliance with the usage limitation in section B.2 shall be demonstrated by the record keeping in section C.2.

F. Miscellaneous Requirements

None