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

Permit To Install **14-05236**

A. Source Description

Trey Corrugated is a manufacturer of corrugated paper sheets. It is a subsidiary of CeCorr Inc. as is Sterling Coatings which is located in the same building. The original PTI (14-4199) covered three roll stock coaters and a flexographic printer. The permittee submitted this PTI application to allow increased emissions for the three roll coaters (emissions units K001, K002 and K003). The flexographic printer is little used and will remain active on the earlier PTI.

B. Facility Emissions and Attainment Status

The facility requested federally enforceable terms and conditions to avoid becoming a Title V facility when they applied for PTI 14-4199. The emissions from the roll coaters are Organic Compounds and Ammonia. HAPs at the facility are from ethylene glycol, glycol ethers and formaldehyde. The facility reported 1.19 tons of HAPs emissions in 2000. The potential OC emissions from the three roll coaters are 1656 TPY of OC. The potential HAP emissions are greater than 24.9 TPY for the combined HAP emissions. The facility is located in Hamilton County which is non-attainment for VOC and attainment for all other criteria pollutants.

C. Source Emissions

This permit will limit the VOC content of the coatings and the usage of coatings so the facility does not become major. Based on the usage and VOC content limits, the VOC emissions will be limited to 28.15 TPY for all three emissions units. The permit will also limit the HAP emissions so they do not exceed 9.9 TPY for any individual HAP and 24.9 TPY for the combined HAPs. The permittee will maintain monthly records and submit quarterly reports.

D. Conclusion

Based upon the above mentioned limits the facility will be a minor facility and will not be subject to the Emissions Offset Policy and the Title V regulations.

State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:
Lazarus Gov. Center

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

RE: DRAFT PERMIT TO INSTALL **CERTIFIED MAIL**
BUTLER COUNTY
Application No: 14-05236
DATE: 1/22/2002

Trey Corrugated / Sterling Coatings
Bryan Sparks
9048 Port Union - Rialto Road
West Chester, OH 45069

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 **$600** 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

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

CC: USEPA HCDES OH-KY-IN Regional Council of Gov. KY IN

DRAFT PERMIT TO INSTALL 14-05236

Application Number:	14-05236
APS Premise Number:	1409000859
Permit Fee:	**To be entered upon final issuance**
Name of Facility:	Trey Corrugated / Sterling Coatings
Person to Contact:	Bryan Sparks
Address:	9048 Port Union - Rialto Road West Chester, OH 45069

Location of proposed air contaminant source(s) [emissions unit(s)]:
9048 Port Union - Rialto Road
West Chester, **Ohio**

Description of proposed emissions unit(s):
Modification of PTI 14-4199 to allow increased emissions for three roll coaters, K001,K002,K003.

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 <u>obtained before</u> the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule

3745-77-08(C)(3)(d).

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

14. Construction Compliance Certification

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

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

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

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

Pollutant	Tons Per Year
OC	28.15
Ammonia	5.0

Emissions Unit ID: **K001**

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

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K001 - Michaelman Coater No. 1	OAC rule 3745-31-05(A)(3)	25.67 lbs OC/hour, excluding clean-up. 2.2 lbs Ammonia/hour See terms A.2.b, A.2.d and A.2.g. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(F) and OAC rule 3745-31-05(D).
	OAC rule 3745-31-05(D)	See terms A.2.c, A.2.e, B.1 and B.2 28.15 tons OC/year*, including clean-up . 5.0 tons Ammonia/year* * Based upon a rolling, 12-month summation. Combined emissions for emissions units K001, K002 and K003.
	OAC rule 3745-21-09(F)	See term A.2.f

2. Additional Terms and Conditions

2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the VOC content and ammonia limits, usage limits and compliance with the Air Toxics Policy.

2.b The volatile organic compound (VOC) content as applied of each coating employed shall not exceed 0.70 lb/gallon, including water and exempt solvents.

2.c The volatile organic compound (VOC) content as applied of all coatings employed shall not exceed 0.10 lb/gallon, including water and exempt solvents based on a monthly, volume-weighted average.

2.d The VOC content of each cleanup material employed shall not exceed 3.5 pounds per gallon.

2.e 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.

2.f The volatile organic compound (VOC) content as applied of each coating employed shall not exceed 2.9 lbs/gallon, excluding water and exempt solvents.

2.g The ammonia content as applied of all coatings employed shall not exceed 0.02 lb/gallon, based on a monthly, volume-weighted average.

B. Operational Restrictions

1. The maximum annual coating usage for emissions units K001, K002 and K003, combined shall not exceed 500,000 gallons per year (including water and exempt solvents), based upon a rolling, 12-month summation of the coating usage figures.

2. The maximum annual organic cleanup material usage for emissions units K001, K002 and K003, combined shall not exceed 1800 gallons per year, based upon a rolling, 12-month summation of the cleanup material usage figures.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records which list the following information for this emissions unit:

   a. the name and identification of each coating and cleanup material employed;

b. the VOC content of each coating (excluding water and exempt solvents), as applied, in lbs VOC/gallon;

c. the VOC content of each coating (including water and exempt solvents), as applied, in lbs VOC/ gallon;

d. the number of gallons of each coating employed, including water and exempt solvents;

e. the VOC content of each clean-up material, in lbs VOC/gallon;

f. the number of gallons of each cleanup material employed;

g. the total VOC emissions for all coatings, in pounds, the sum of (c x d) for each coating;

h. the total number of hours of operation; and

i. the average hourly total VOC emissions rate, i.e. (g) divided by (h).

2. The permittee shall collect and record the following information each month for emissions units K001, K002 and K003, combined:

a. the total coating usage for each month;

b. the updated rolling, 12-month summation of the coating usage figures;

c. the total cleanup material usage for each month;

d. the updated rolling, 12-month summation of the cleanup material usage figures;

e. the monthly, volume-weighted average VOC content of all of the coatings employed during the calendar month, in lbs VOC/gallon, as applied, including water and exempt solvents; and

f. the monthly, volume-weighted average ammonia content of all of the coatings employed during the calendar month, in lbs ammonia/gallon, as applied.

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

c. the total combined HAP content of each coating, in pounds of combined HAPs per gallon of coating, as applied [the sum of 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 [the sum of 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 plus the sum of (f) times (h) for each cleanup material]; and

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 of emissions for each individual 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 of emissions for total combined HAPs, 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.

4. The permit to install for this emissions unit K001 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: Ammonia

TLV (ug/m3): 17,400

Maximum Hourly Emission Rate (lbs/hr): 6.6

Predicted 1 Hour Maximum Ground-level Concentration (ug/m3): 402

Maximum Acceptable Ground-level Concentration (MAGLC) (ug/m3): 414

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.).

5. 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 of any daily record which shows the use of noncomplying coatings and/or cleanup materials (i.e., coatings or cleanup materials exceeding the allowable VOC content limits). A copy of such record 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 submit quarterly reports which specify the following information for the previous calendar quarter:

a. the updated rolling, 12-month summation of the coating usage for emissions units K001, K002 and K003 combined for each calendar month;

b. the updated rolling, 12-month summation of the clean-up material usage for emissions units K001, K002 and K003 combined for each calendar month;

c. the monthly, volume-weighted average VOC content of all of the coatings employed during the calendar month, in lbs VOC/gallon, as applied, including water and exempt solvents.

d. the monthly, volume-weighted average ammonia content of all of the coatings employed during the calendar month, in lbs ammonia/gallon, as applied.

These reports shall be submitted by January 31, April 30, July 31 and October 31 and cover the previous calendar quarter.

3. The permittee shall submit deviation reports which identify all exceedances of the HAP emissions limitation in term A.2.e. If no exceedances occurred during the reporting period then a report is required stating so.

4. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

5. The permittee shall also submit annual reports which specify the total volatile organic compound 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. USEPA Method 24 shall be used to determine the VOC content for each coating employed. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

2. Compliance with the HAP usage limits in term A.2.e shall be demonstrated by the record keeping in term C.3.

3. Compliance with the usage limits in terms B.1 and B.2 shall be demonstrated by the record keeping in term C.2.

4. Compliance with the annual VOC emissions limit shall be demonstrated by the sum of the daily records in C.1.

5. Compliance with the OC content limitations in term A.2.c shall be demonstrated by the record keeping requirements outlined in C.2.

6. Compliance with the ammonia limitations in term A.2.g shall be demonstrated by the record keeping requirements outlined in C.2.

F. Miscellaneous Requirements

1. The terms and conditions in this permit to install shall supersede permit to install (PTI) 14-04199 issued on May 12, 1999 for emissions units K001, K002 and K003.

2. The following terms and conditions of this permit are federally enforceable: A., B., C.1 - C.3, 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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K002 - Michaelman Coater No. 2	OAC rule 3745-31-05(A)(3)	25.67 lbs OC/hour, excluding clean-up. 2.2 lbs Ammonia/hour See terms A.2.b, A.2.d and A.2.g.
	OAC rule 3745-31-05(D)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(F) and OAC rule 3745-31-05(D). See terms A.2.c, A.2.e, B.1 and B.2 28.15 tons OC/year*, including clean-up . 5.0 tons Ammonia/year* * Based upon a rolling, 12-month summation. Combined emissions for emissions units K001, K002 and K003.
	OAC rule 3745-21-09(F)	See term A.2.f

2. Additional Terms and Conditions

2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the VOC content and ammonia limits, usage limits and compliance with the Air Toxics Policy.

2.b The volatile organic compound (VOC) content as applied of each coating employed shall not exceed 0.70 lb/gallon, including water and exempt solvents.

2.c The volatile organic compound (VOC) content as applied of all coatings employed shall not exceed 0.10 lb/gallon, including water and exempt solvents based on a monthly, volume-weighted average.

2.d The VOC content of each cleanup material employed shall not exceed 3.5 pounds per gallon.

2.e 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.

2.f The volatile organic compound (VOC) content as applied of each coating employed shall not exceed 2.9 lbs/gallon, excluding water and exempt solvents.

2.g The ammonia content as applied of all coatings employed shall not exceed 0.02 lb/gallon, based on a monthly, volume-weighted average.

B. Operational Restrictions

1. The maximum annual coating usage for emissions units K001, K002 and K003, combined shall not exceed 500,000 gallons per year (including water and exempt solvents), based upon a rolling, 12-month summation of the coating usage figures.

2. The maximum annual organic cleanup material usage for emissions units K001, K002 and K003, combined shall not exceed 1800 gallons per year, based upon a rolling, 12-month summation of the cleanup material usage figures.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records which list the following information for this emissions unit:

a. the name and identification of each coating and cleanup material employed;

b. the VOC content of each coating (excluding water and exempt solvents), as applied, in lbs VOC/gallon;

c. the VOC content of each coating (including water and exempt solvents), as applied, in lbs VOC/ gallon;

d. the number of gallons of each coating employed, including water and exempt solvents;

e. the VOC content of each clean-up material, in lbs VOC/gallon;

f. the number of gallons of each cleanup material employed;

g. the total VOC emissions for all coatings, in pounds, the sum of (c x d) for each coating;

h. the total number of hours of operation; and

i. the average hourly total VOC emissions rate, i.e. (g) divided by (h).

2. The permittee shall collect and record the following information each month for emissions units K001, K002 and K003, combined:

a. the total coating usage for each month;

b. the updated rolling, 12-month summation of the coating usage figures;

c. the total cleanup material usage for each month;

d. the updated rolling, 12-month summation of the cleanup material usage figures;

e. the monthly, volume-weighted average VOC content of all of the coatings employed during the calendar month, in lbs VOC/gallon, as applied, including water and exempt solvents; and

f. the monthly, volume-weighted average ammonia content of all of the coatings employed during the calendar month, in lbs ammonia/gallon, as applied.

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

c. the total combined HAP content of each coating, in pounds of combined HAPs per gallon of coating, as applied [the sum of 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 [the sum of 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 plus the sum of (f) times (h) for each cleanup material]; and

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 of emissions for each individual 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 of emissions for total combined HAPs, 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.

4. The permit to install for this emissions unit K002 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: Ammonia

   TLV (ug/m3): 17,400

   Maximum Hourly Emission Rate (lbs/hr): 6.6

   Predicted 1 Hour Maximum Ground-level Concentration (ug/m3): 402

   Maximum Acceptable Ground-level Concentration (MAGLC) (ug/m3): 414

   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.).

5. 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 of any daily record which shows the use of noncomplying coatings and/or cleanup materials (i.e., coatings or cleanup materials exceeding the allowable VOC content limits). A copy of such record 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 submit quarterly reports which specify the following information for the previous calendar quarter:

   a. the updated rolling, 12-month summation of the coating usage for emissions units K001, K002 and K003 combined for each calendar month;

   b. the updated rolling, 12-month summation of the clean-up material usage for emissions units K001, K002 and K003 combined for each calendar month;

   c. the monthly, volume-weighted average VOC content of all of the coatings employed during the calendar month, in lbs VOC/gallon, as applied, including water and exempt solvents.

   d. the monthly, volume-weighted average ammonia content of all of the coatings employed during the calendar month, in lbs ammonia/gallon, as applied.

   These reports shall be submitted by January 31, April 30, July 31 and October 31 and cover the previous calendar quarter.

3. The permittee shall submit deviation reports which identify all exceedances of the HAP emissions limitation in term A.2.e. If no exceedances occurred during the reporting period then a report is required stating so.

4. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

5. The permittee shall also submit annual reports which specify the total volatile organic compound 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. USEPA Method 24 shall be used to determine the VOC content for each coating employed. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify

the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

2. Compliance with the HAP usage limits in term A.2.e shall be demonstrated by the record keeping in term C.3.

3. Compliance with the usage limits in terms B.1 and B.2 shall be demonstrated by the record keeping in term C.2.

4. Compliance with the annual VOC emissions limit shall be demonstrated by the sum of the daily records in C.1

5. Compliance with the OC content limitations in term A.2.c shall be demonstrated by the record keeping requirements outlined in C.2.

6. Compliance with the ammonia limitations in term A.2.g shall be demonstrated by the record keeping requirements outlined in C.2.

F. Miscellaneous Requirements

1. The terms and conditions in this permit to install shall supersede permit to install (PTI) 14-04199 issued on May 12, 1999 for emissions units K001, K002 and K003.

2. The following terms and conditions of this permit are federally enforceable: A., B., C.1 - C.3, D. and E.

Emissions Unit ID: **K003**

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

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K003 - Michaelman Coater No. 3	OAC rule 3745-31-05(A)(3)	25.67 lbs OC/hour, excluding clean-up. 2.2 lbs Ammonia/hour See terms A.2.b, A.2.d and A.2.g. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(F) and OAC rule 3745-31-05(D).
	OAC rule 3745-31-05(D)	See terms A.2.c, A.2.e, B.1 and B.2 28.15 tons OC/year*, including clean-up . 5.0 tons Ammonia/year* * Based upon a rolling, 12-month summation. Combined emissions for emissions units K001, K002 and K003.
	OAC rule 3745-21-09(F)	See term A.2.f

2. Additional Terms and Conditions

2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the VOC content and ammonia limits, usage limits and compliance with the Air Toxics Policy.

2.b The volatile organic compound (VOC) content as applied of each coating employed shall not exceed 0.70 lb/gallon, including water and exempt solvents.

2.c The volatile organic compound (VOC) content as applied of all coatings employed shall not exceed 0.10 lb/gallon, including water and exempt solvents based on a monthly, volume-weighted average.

2.d The VOC content of each cleanup material employed shall not exceed 3.5 pounds per gallon.

2.e 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.

2.f The volatile organic compound (VOC) content as applied of each coating employed shall not exceed 2.9 lbs/gallon, excluding water and exempt solvents.

2.g The ammonia content as applied of all coatings employed shall not exceed 0.02 lb/gallon, based on a monthly, volume-weighted average.

B. Operational Restrictions

1. The maximum annual coating usage for emissions units K001, K002 and K003, combined shall not exceed 500,000 gallons per year (including water and exempt solvents), based upon a rolling, 12-month summation of the coating usage figures.

2. The maximum annual organic cleanup material usage for emissions units K001, K002 and K003, combined shall not exceed 1800 gallons per year, based upon a rolling, 12-month summation of the cleanup material usage figures.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records which list the following information for this emissions unit:

   a. the name and identification of each coating and cleanup material employed;

b. the VOC content of each coating (excluding water and exempt solvents), as applied, in lbs VOC/gallon;

c. the VOC content of each coating (including water and exempt solvents), as applied, in lbs VOC/ gallon;

d. the number of gallons of each coating employed, including water and exempt solvents;

e. the VOC content of each clean-up material, in lbs VOC/gallon;

f. the number of gallons of each cleanup material employed;

g. the total VOC emissions for all coatings, in pounds, the sum of (c x d) for each coating;

h. the total number of hours of operation; and

i. the average hourly total VOC emissions rate, i.e. (g) divided by (h).

2. The permittee shall collect and record the following information each month for emissions units K001, K002 and K003, combined:

a. the total coating usage for each month;

b. the updated rolling, 12-month summation of the coating usage figures;

c. the total cleanup material usage for each month;

d. the updated rolling, 12-month summation of the cleanup material usage figures;

e. the monthly, volume-weighted average VOC content of all of the coatings employed during the calendar month, in lbs VOC/gallon, as applied, including water and exempt solvents; and

f. the monthly, volume-weighted average ammonia content of all of the coatings employed during the calendar month, in lbs ammonia/gallon, as applied.

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

c. the total combined HAP content of each coating, in pounds of combined HAPs per gallon of coating, as applied [the sum of 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 [the sum of 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 plus the sum of (f) times (h) for each cleanup material]; and

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 of emissions for each individual 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 of emissions for total combined HAPs, 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.

4. The permit to install for this emissions unit K003 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: Ammonia

TLV (ug/m3): 17,400

Maximum Hourly Emission Rate (lbs/hr): 6.6

Predicted 1 Hour Maximum Ground-level Concentration (ug/m3): 402

Maximum Acceptable Ground-level Concentration (MAGLC) (ug/m3): 414

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.).

5. 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 of any daily record which shows the use of noncomplying coatings and/or cleanup materials (i.e., coatings or cleanup materials exceeding the allowable VOC content limits). A copy of such record 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 submit quarterly reports which specify the following information for the previous calendar quarter:

   a. the updated rolling, 12-month summation of the coating usage for emissions units K001, K002 and K003 combined for each calendar month;

   b. the updated rolling, 12-month summation of the clean-up material usage for emissions units K001, K002 and K003 combined for each calendar month;

   c. the monthly, volume-weighted average VOC content of all of the coatings employed during the calendar month, in lbs VOC/gallon, as applied, including

water and exempt solvents.

d. the monthly, volume-weighted average ammonia content of all of the coatings employed during the calendar month, in lbs ammonia/gallon, as applied.

These reports shall be submitted by January 31, April 30, July 31 and October 31 and cover the previous calendar quarter.

3. The permittee shall submit deviation reports which identify all exceedances of the HAP emissions limitation in term A.2.e. If no exceedances occurred during the reporting period then a report is required stating so.

4. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

5. The permittee shall also submit annual reports which specify the total volatile organic compound 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. USEPA Method 24 shall be used to determine the VOC content for each coating employed. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

2. Compliance with the HAP usage limits in term A.2.e shall be demonstrated by the record keeping in term C.3.

3. Compliance with the usage limits in terms B.1 and B.2 shall be demonstrated by the record keeping in term C.2.

4. Compliance with the annual VOC emissions limit shall be demonstrated by the sum of the daily records in C.1.

5. Compliance with the OC content limitations in term A.2.c shall be demonstrated by the record keeping requirements outlined in C.2.

6. Compliance with the ammonia limitations in term A.2.g shall be demonstrated by the record keeping requirements outlined in C.2.

F. Miscellaneous Requirements

1. The terms and conditions in this permit to install shall supersede permit to install (PTI) 14-04199 issued on May 12, 1999 for emissions units K001, K002 and K003.

2. The following terms and conditions of this permit are federally enforceable: A., B., C.1 - C.3, D. and E.