

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

Permit To Install **14-04822**

A. Source Description

This Permit to Install (PTI 14-4822) covers three miscellaneous metal parts paint spray booths used to coat custom mobile tractor trailers and ISO shelters. The permittee has applied for a federally enforceable PTI.

B. Facility Emissions and Attainment Status

Mobilized Systems, Inc. is a major stationary source based on potential Hazardous Air Pollutants (HAPs) emissions. This facility is located in Clermont County. Clermont County is designated as attainment for PM/PM<sub>10</sub>, SO<sub>2</sub>, and CO and is designated non-attainment for OC and NO<sub>x</sub> for purposes of new source review. The permittee wishes to incorporate federally enforceable limitations in the PTI limiting HAP emissions to 9.9 TPY for any single HAP and 24.9 TPY for combined HAPs.

C. Source Emissions

The potential emissions from this emissions unit in the absence of this federally enforceable PTI are calculated at 78.9 TPY of an individual HAP and 155.7 TPY for combined HAP's. The emissions limitations outlined in this PTI limit HAP emissions to 9.9 TPY of any single HAP and 24.9 TPY of combined HAPs. The permittee will record coating usages and submit reports as described in the PTI's terms and conditions to ensure compliance with the emissions limitations.

D. Conclusion

The terms and conditions in this PTI limit the permittee's potential HAP emissions to less than 10 TPY of any single HAP and less than 25 TPY of combined HAPs.

The permittee will maintain coating usage records and submit reports as outlined in the terms and conditions for all emissions units to demonstrate compliance with the emission limitations.



Street Address:

State of Ohio Environmental Protection Agency  
Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:  
Lazarus Gov.  
Center

**RE: DRAFT PERMIT TO INSTALL MODIFICATION  
CLERMONT COUNTY  
Application No: 14-04822**

**CERTIFIED MAIL**

**DATE:** 10/16/2001

Mobilized Systems Inc  
Lisa Lairson  
1032 Seabrook Way  
Cincinnati, OH 45245

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install modification for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit modification. 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 modification 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 modification may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install modification a fee of **\$ 300** will be due. Please do not submit any payment now.

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

Very truly yours,

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

CC: USEPA HCDES Ohio-Kentucky-Indiana Reg Council of Gov KY IN

**Permit To Install  
Terms and Conditions**

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

**DRAFT MODIFICATION OF PERMIT TO INSTALL 14-04822**

Application Number: 14-04822  
APS Premise Number: 1413000402  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: Mobilized Systems Inc  
Person to Contact: Lisa Lairson  
Address: 1032 Seabrook Way  
Cincinnati, OH 45245

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**1032 Seabrook Way  
Withamsville, Ohio**

Description of proposed emissions unit(s):  
**Modification of PTI 14-04822 issued on 6/14/2000 3 metal parts paint spray booths.**

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification 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 source(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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

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

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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

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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

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

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

**14. Construction Compliance Certification**

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

**15. Fees**

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

**B. Permit to Install Summary of Allowable Emissions**

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	9.7
Single HAP	9.9
Total HAP's	24.9

**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 - Drive Through Paint Booth # 1 Modification	OAC rule 3745-31-05(A)(3)	89.8 lbs/day VOC including cleanup 3.86 TPY VOC including cleanup
	OAC rule 3745-31-05(D)	3.86 TPY VOC including cleanup*
	OAC rule 3745-15-07	See Part I, Term A.7
	OAC rule 3745-21-09 (U)(2)(f)	Same as OAC rule 3745-31-05 and terms A.2.c., A.2.d., and B.1.
		* Emissions limitation based on a rolling, 12-month summation

**2. Additional Terms and Conditions**

- 2.a Compliance with OAC rule 3745-31-05 shall demonstrated by VOC content limits for all coatings and cleanup materials, usage limitations and compliance with the Air Toxics Policy.
- 2.b The total allowable usage 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.

\* This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporates.

- 2.c** The volatile organic compound (VOC) content, as applied of each coating employed in this emissions unit shall not exceed 6.3 pounds of VOC per gallon of coating, excluding water and exempt solvents.
- 2.d** The VOC content of each cleanup material employed in this emissions unit shall not exceed 5.8 pounds of VOC per gallon of cleanup material.

**B. Operational Restrictions**

- 1. The maximum annual coating and cleanup material usage for this emissions unit shall not exceed 765 gallons per year for coatings and 500 gallons per year for cleanup materials, based upon a rolling, 12-month summation of the coating and cleanup material usage figures. The permittee has existing records to demonstrate compliance with these limits upon issuance of this permit.
- 2. The maximum daily coating and cleanup material usage for emissions unit K001 shall not exceed 9.65 gallons per day for coatings and 5 gallons per day for cleanup materials.

**C. Monitoring and/or Recordkeeping Requirements**

- 1. 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 employed.
  - 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 [sum all the individual HAP contents from (b)].
  - d. The number of gallons of each coating employed.
  - e. The name and identification of each cleanup material employed.
  - f. The individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon of cleanup material, as applied.
  - g. The total combined HAP content of each cleanup material in pounds of combined HAPs per gallon of cleanup material, as applied [sum all the individual HAP contents from (f)].
  - h. The number of gallons of each cleanup material employed.

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- i. The total individual HAP usage for each HAP from all coatings and cleanup materials employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each coating and the sum of (f) times (h) for each cleanup material].
- j. The total combined HAP usage 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].

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- k. The updated rolling, 12-month summation for individual HAP emissions\*\* for each HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
  - l. The updated rolling, 12-month summation for total combined HAP emissions\*\*, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
    - \* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.
    - \*\* This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporates.
2. The permittee shall collect and record the following information each day for emissions unit K001:
- a. The name and identification number of each coating employed.
  - b. The volume, in gallons, of each coating employed.
  - c. The VOC content of each coating, in pounds per gallon, as applied, excluding water and exempt solvents.
  - d. The name and identification of each cleanup material employed.
  - e. The volume, in gallons, of each cleanup material employed.
  - f. The VOC content of each cleanup material, in pounds per gallon.
  - g. The total organic compound emission rate for all coatings and cleanup materials employed, in pounds per day  $[(b \times c) + (e \times f)]$ .
3. The permittee shall maintain monthly records of the following information:
- a. The coating and cleanup material usage for each month; and
  - b. The updated rolling, 12-month summation of the coating and cleanup material usage

figures.

4. The permit to install for this emissions unit 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

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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: Isopropyl alcohol

TLV (ug/m3): 983,000

Maximum Hourly Emission Rate (lbs/hr): 23.52

Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 16,484

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 23,404

Pollutant: toluene

TLV (ug/m3): 188,000

Maximum Hourly Emission Rate (lbs/hr): 4.0

Predicted 1 Hour Maximum Ground-Level Concentration  
(ug/m3): 2715

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 4476

Pollutant: diethylene triamine

TLV (ug/m3): 4200

Maximum Hourly Emission Rate (lbs/hr): .48

Predicted 1 Hour Maximum Ground-Level Concentration  
(ug/m3): 62.8

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 100

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;

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- 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

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- 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. where 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 submit annual reports which specify the total VOC emissions from emissions unit K001 for the previous calendar year. These reports shall be submitted by January 30 of each year.
2. The permittee shall notify the Hamilton County Department of Environmental Services of any monthly record showing any deviation from the following:
  - a. The total individual HAP usage limitation for each HAP from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12-month period.
  - b. The total combined HAP usage limitation from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12-month period.
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the

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daily and/or rolling, 12-month coating and cleanup material usage limitations. The report shall also include any exceedances of the coating and cleanup material VOC content limitations. 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.

#### **E. Testing Requirements**

1. USEPA Methods 24 and 24A shall be used to determine the VOC content for coatings and cleanup materials employed in emissions unit K001. If, pursuant to section 4.3 of Method 24,40 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.
2. Compliance with the annual usage limits cited in term B.1 shall be demonstrated by the record keeping in terms C.2 and C.3.
3. Compliance with the VOC content limits cited in term A.2.c. and A.2.d. shall be demonstrated by the record keeping in term C.2.
4. Compliance with daily VOC emission limit and the daily coating and cleanup material usage limit shall be determined by the recordkeeping requirements in term C.2 of this permit.
5. Compliance with the HAP limitation cited in term A.2.b. shall be determined by the recordkeeping requirements in term C.1 of this permit.

#### **F. Miscellaneous Requirements**

1. The following terms and conditions are federally enforceable: A.2.b, A.2.c, A.2.d, B.1, B.2, C.1, C.2, C.3, D.2, D.3, E.1 through E.5.

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

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K002 - Drive Through Paint Booth # 2 Modification	OAC rule 3745-31-05(A)(3)	89.8 lbs/day VOC including cleanup 3.86 TPY VOC including cleanup
	OAC rule 3745-31-05(D)	3.86 TPY VOC including cleanup*
	OAC rule 3745-15-07	See Part I, Term A.7
	OAC rule 3745-21-09 (U)(2)(f)	Same as OAC rule 3745-31-05 and terms A.2.c., A.2.d., and B.1.
		* Emissions limitation based on a rolling 12-month summation

**2. Additional Terms and Conditions**

- 2.a Compliance with OAC rule 3745-31-05 shall demonstrated by VOC content limits for all coatings and cleanup materials, usage limitations and compliance with the Air Toxics Policy.
- 2.b The total allowable usage 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.

\* This assumes the HAPs emitted are the same as the amount of HAPs used since all

HAPs used evaporate.

- 2.c** The volatile organic compound (VOC) content, as applied of each coating employed in this emissions unit shall not exceed 6.3 pounds of VOC per gallon of coating, excluding water and exempt solvents.
- 2.d** The VOC content of each cleanup material employed in this emissions unit shall not exceed **5.8** pounds of VOC per gallon of cleanup material.

**B. Operational Restrictions**

- 1. The maximum annual coating and cleanup material usage for this emissions unit shall not exceed 765 gallons per year for coatings and 500 gallons per year for cleanup materials, based upon a rolling, 12-month summation of the coating and cleanup material usage figures. The permittee has existing records to demonstrate compliance with these limits upon issuance of this permit.
- 2. The maximum daily coating and cleanup material usage for emissions unit K001 shall not exceed 9.65 gallons per day for coatings and 5 gallons per day for cleanup materials.

**C. Monitoring and/or Recordkeeping Requirements**

- 1. 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 employed.
  - 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 [sum all the individual HAP contents from (b)].
  - d. The number of gallons of each coating employed.
  - e. The name and identification of each cleanup material employed.
  - f. The individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon of cleanup material, as applied.
  - g. The total combined HAP content of each cleanup material in pounds of combined HAPs per gallon of cleanup material, as applied [sum all the individual HAP contents from (f)].

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- h. The number of gallons of each cleanup material employed.
- i. The total individual HAP usage for each HAP from all coatings and cleanup materials employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each coating and the sum of (f) times (h) for each cleanup material].
- j. The total combined HAP usage 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].

**Mobil**

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- k. The updated rolling, 12-month summation for individual HAP emissions\*\* for each HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
  - l. The updated rolling, 12-month summation for total combined HAP emissions\*\*, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
    - \* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.
    - \*\* This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.
2. The permittee shall collect and record the following information each day for emissions unit K002:
- a. The name and identification number of each coating employed.
  - b. The volume, in gallons, of each coating employed.
  - c. The VOC content of each coating, in pounds per gallon, as applied, excluding water and exempt solvents.
  - d. The name and identification of each cleanup material employed.
  - e. The volume, in gallons, of each cleanup material employed.
  - f. The VOC content of each cleanup material, in pounds per gallon.
  - g. The total organic compound emission rate for all coatings and cleanup materials employed, in pounds per day  $[(b \times c) + (e \times f)]$ .
3. The permittee shall maintain monthly records of the following information:
- a. The coating and cleanup material usage for each month; and
  - b. The updated rolling, 12-month summation of the coating and cleanup material usage

figures.

4. The permit to install for this emissions unit 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

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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: Isopropyl alcohol

TLV (ug/m3): 983,000

Maximum Hourly Emission Rate (lbs/hr): 23.52

Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 16,484

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 23,404

Pollutant: toluene

TLV (ug/m3): 188,000

Maximum Hourly Emission Rate (lbs/hr): 4.0

Predicted 1 Hour Maximum Ground-Level Concentration  
(ug/m3): 2715

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 4476

Pollutant: diethylene triamine

TLV (ug/m3): 4200

Maximum Hourly Emission Rate (lbs/hr): .48

Predicted 1 Hour Maximum Ground-Level Concentration  
(ug/m3): 62.8

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 100

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;

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- 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

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- 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. where 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 submit annual reports which specify the total VOC emissions from emissions unit K002 for the previous calendar year. These reports shall be submitted by January 30 of each year.
2. The permittee shall notify the Hamilton County Department of Environmental Services of any monthly record showing any deviation from the following:
  - a. The total individual HAP usage limitation for each HAP from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12-month period.
  - b. The total combined HAP usage limitation from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12-month period.
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the

Emissions Unit ID: **K002**

daily and/or rolling, 12-month coating and cleanup material usage limitation. The report shall also include any exceedances of the coating and cleanup material VOC content limitations. 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.

#### **E. Testing Requirements**

1. USEPA Methods 24 and 24A shall be used to determine the VOC content for coatings and cleanup materials employed in emissions unit K002. If, pursuant to section 4.3 of Method 24,40 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.
2. Compliance with the annual usage limits cited in term B.1 shall be demonstrated by the record keeping in terms C.2 and C.3.
3. Compliance with the VOC content limits cited in term A.2.c. A.2.d. shall be demonstrated by the record keeping in term C.2.
4. Compliance with daily VOC emission limit and the daily coating and cleanup material usage limit shall be determined by the recordkeeping requirements in term C.2. of this permit.
5. Compliance with the HAP limitation cited in term A.2.b shall be determined by the recordkeeping requirements in term C.1 of this permit.

#### **F. Miscellaneous Requirements**

1. The following terms and conditions are federally enforceable: A.2.b, A.2.c, A.2.d, B.1, B. 2, C.1, C.2, C.3, D.2, D.3, E.1 through E.5.

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

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K003 - Misc. Metal Parts Paint Spray Booth Modification	OAC rule 3745-31-05 (A)(3)	33.1 lbs/day VOC including cleanup 1.97 TPY VOC including cleanup
	OAC rule 3745-31-05 (D)	1.97 TPY VOC including cleanup*
	OAC rule 3745-15-07	See Part I, Term A.7
	OAC rule 3745-21-09 (U)(2)(e)(ii)	See term B.2
		* Emissions limitation based on a rolling 12-month summation

**2. Additional Terms and Conditions**

- 2.a Compliance with OAC rule 3745-31-05 shall demonstrated by VOC content limits for all coatings and cleanup materials, usage limitations and compliance with the Air Toxics Policy.
- 2.b The total allowable usage 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.

\* This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.

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- 2.c** The volatile organic compound (VOC) content, as applied of each coating employed in this emissions unit shall not exceed 6.3 pounds of VOC per gallon of coating, excluding water and exempt solvents.
- 2.d** The VOC content of each cleanup material employed in this emissions unit shall not exceed 5.8 pounds of VOC per gallon of cleanup material.

**B. Operational Restrictions**

- 1. The maximum annual coating and cleanup material usage for this emissions unit shall not exceed 250 gallons per year for coatings and 400 gallons per year for cleanup materials, based upon a rolling, 12-month summation of the coating and cleanup material usage figures. The permittee has existing records to demonstrate compliance with these limits upon issuance of this permit.
- 2. The maximum daily coating usage for this emissions unit shall not exceed 2.49 gallons per day.
- 3. The maximum daily cleanup material usage for emissions unit K003 shall not exceed 3 gallons per day.

**C. Monitoring and/or Recordkeeping Requirements**

- 1. 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 employed.
  - 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 [sum all the individual HAP contents from (b)].
  - d. The number of gallons of each coating employed.
  - e. The name and identification of each cleanup material employed.
  - f. The individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon of cleanup material, as applied.
  - g. The total combined HAP content of each cleanup material in pounds of combined HAPs per gallon of cleanup material, as applied [sum all the individual HAP contents from (f)].

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- h. The number of gallons of each cleanup material employed.
  - i. The total individual HAP usage for each HAP from all coatings and cleanup materials employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each coating and the sum of (f) times (h) for each cleanup material].
  - j. The total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material].
  - k. The updated rolling, 12-month summation for individual HAP emissions\*\* for each HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
  - l. The updated rolling, 12-month summation for total combined HAP emissions\*\*, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
    - \* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.
    - \*\* This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.
2. The permittee shall collect and record the following information each day for emissions unit K003:
- a. The name and identification number of each coating employed.
  - b. The volume, in gallons, of each coating employed.
  - c. The VOC content of each coating, in pounds per gallon, as applied, excluding water and exempt solvents.
  - d. The name and identification of each cleanup material employed.
  - e. The volume, in gallons, of each cleanup material employed.

- f. The VOC content of each cleanup material, in pounds per gallon.
  - g. The total organic compound emission rate for all coatings and cleanup materials employed, in pounds per day  $[(b \times c) + (e \times f)]$ .
3. The permittee shall maintain monthly records of the following information:
- a. The coating and cleanup material usage for each month; and
  - b. The updated rolling, 12-month summation of the coating and cleanup material usage figures.

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Emissions Unit ID: **K003**

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4. The permit to install for this emissions unit 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: Isopropyl alcohol

TLV (ug/m3): 983,000

Maximum Hourly Emission Rate (lbs/hr): 23.52

Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 16,484

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 23,404

Pollutant: toluene

TLV (ug/m3): 188,000

Maximum Hourly Emission Rate (lbs/hr): 4.0

Predicted 1 Hour Maximum Ground-Level Concentration  
(ug/m3): 2715

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 4476

Pollutant: diethylene triamine

TLV (ug/m3): 4200

Maximum Hourly Emission Rate (lbs/hr): .48

Predicted 1 Hour Maximum Ground-Level Concentration  
(ug/m3): 62.8

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 100

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:

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- 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. where 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 submit annual reports which specify the total VOC emissions from emissions unit K003 for the previous calendar year. These reports shall be submitted by January 30 of each year.
2. The permittee shall notify the Hamilton County Department of Environmental Services of any monthly record showing any deviation from the following:

Emissions Unit ID: **K003**

- a. The total individual HAP usage limitation for each HAP from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12-month period.
- b. The total combined HAP usage limitation from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12-month period.
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month coating and cleanup material usage limitations. The report shall also include any exceedances of the VOC content limitations. If no exceedances occurred during the reporting period then a report is required stating so.
4. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating or cleanup material usage limit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
5. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

**E. Testing Requirements**

1. USEPA Methods 24 and 24A shall be used to determine the VOC content for coatings and cleanup materials employed in emissions unit K003. If, pursuant to section 4.3 of Method 24,40 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.
2. Compliance with the annual usage limits cited in term B.1 shall be demonstrated by the record keeping in terms C.2 and C.3.
3. Compliance with the VOC content limits cited in term A.2.c and A.2.d shall be demonstrated by the record keeping in term C.2.
4. Compliance with daily VOC emission limit and the daily coating and cleanup material usage limit shall be determined by the recordkeeping requirements in term C.2. of this permit.
5. Compliance with the HAP limitation cited in term A.2.b shall be determined by the recordkeeping

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requirements in term C.1 of this permit.

**F. Miscellaneous Requirements**

1. The following terms and conditions are federally enforceable: A.2.b, A.2.c, A.2.d, B.1, B.2, B.3, C.1, C.2, C.3, D.2, D.3, D.4, E.1 through E.5.

**NEW SOURCE REVIEW FORM B**

PTI Number: 14-04822 Facility ID: 1413000402

FACILITY NAME Mobilized Systems Inc

FACILITY DESCRIPTION Modification of PTI 14-04822 issued on 6/14/2000 3 metal parts paint spray booths CITY/TWP Withamsville

SIC CODE 3715 SCC CODE 4-02-006-10 EMISSIONS UNIT ID K001

EMISSIONS UNIT DESCRIPTION Drive Through Paint Booth # 1 Modification

DATE INSTALLED 1-95

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

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds	attainment			89.8 lbs/day	3.86
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

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

VOC content limits, usage limitations and compliance with the Air Toxics Policy.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes  
 OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

**TOXIC AIR CONTAMINANTS**

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

AIR TOXICS MODELING PERFORMED\*? X YES        NO

IDENTIFY THE AIR CONTAMINANTS: tri-ethylene triamine, toluene, isopropyl alcohol

**NEW SOURCE REVIEW FORM B**

PTI Number: 14-04822

Facility ID: 1413000402

FACILITY NAME Mobilized Systems Inc

FACILITY DESCRIPTION Modification of PTI 14-04822 issued on CITY/TWP Withamsville

Emissions Unit ID: **K003**

SIC CODE 3715

SCC CODE 4-02-006-10

EMISSIONS UNIT ID K002

EMISSIONS UNIT DESCRIPTION Drive Through Paint Booth # 2 Modification

DATE INSTALLED 1/95

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

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds	attainment			89.8 lbs/day	3.86
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS?

NESHAP?

PSD?

OFFSET POLICY?

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

VOC content limits, usage limitations and compliance with the Air Toxics Policy.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

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

**TOXIC AIR CONTAMINANTS**

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

AIR TOXICS MODELING PERFORMED\*? X YES        NO

IDENTIFY THE AIR CONTAMINANTS: tri-ethylene triamine, toluene, isopropyl alcohol

**3 NEW SOURCE REVIEW FORM B**

PTI Number: 14-04822

Facility ID: 1413000402

FACILITY NAME Mobilized Systems Inc

FACILITY DESCRIPTION Modification of PTI 14-04822 issued on CITY/TWP Withamsville

Emissions Unit ID: **K003**

SIC CODE 3715

SCC CODE 4-02-006-10

EMISSIONS UNIT ID K003

EMISSIONS UNIT DESCRIPTION Misc. Metal Parts Paint Spray Booth Modification

DATE INSTALLED 1-95

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

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds	attainment			33.1 lbs/day	1.97
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS?

NESHAP?

PSD?

OFFSET POLICY?

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

**VOC content limits, usage limitations and compliance with the Air Toxics Policy.**IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT?

\$

**TOXIC AIR CONTAMINANTS**

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

AIR TOXICS MODELING PERFORMED\*?

X

YES

NO

IDENTIFY THE AIR CONTAMINANTS:

tri-ethylene triamine, toluene, isopropyl alcohol