



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

Lazarus Gov. Center

**RE: DRAFT PERMIT TO INSTALL  
HAMILTON COUNTY  
Application No: 14-04811**

**CERTIFIED MAIL**

**DATE: 6/28/00**

The Avon Workshop, Inc.  
E. L. Saenger, Jr.  
6245 Creek Road  
Cincinnati, OH

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$1200** 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

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OH-IN-KY Reg Council of Govts



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Permit To Install  
Terms and Conditions**

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

**DRAFT PERMIT TO INSTALL 14-04811**

Application Number: 14-04811  
APS Premise Number: 1431053946  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: The Avon Workshop, Inc.  
Person to Contact: E. L. Saenger, Jr.  
Address: 6245 Creek Road  
Cincinnati, OH 45242

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**6245 Creek Road  
Blue Ash, Ohio**

Description of proposed emissions unit(s):  
**Paint Spray Booths with Filters.**

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

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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

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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 are inadequate 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 prove to be inadequate 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**

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the

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permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the emissions unit(s) covered by this permit.

**14. Construction Compliance Certification**

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

**15. Fees**

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

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

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

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

<b><u>Pollutant</u></b>	<b><u>Tons Per Year</u></b>
<b>OC</b>	<b>75.65</b>
<b>Single HAP</b>	<b>9.9</b>
<b>Total HAP's</b>	<b>24.9</b>

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

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R001 - Paint Spray Booth with dry filter (Modification)	OAC rule 3745-31-05 (A)(3)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2).  1436.0 lbs/day OC, from all coatings  67.0 lbs/day OC, from cleanup materials  See Section B.1.
	OAC rule 3745-31-05(D)	75.65 TPY OC, including cleanup, based upon a rolling, 12-month summation for emissions units R001-R006 combined  See Sections A.2.a., A.2.b. and B.2.
	OAC rule 3745-21-07(G)(2)	Exempt from the requirements of this rule pursuant to term B.3.

**2. Additional Terms and Conditions**

- 2.a The organic compound (OC) content, as applied, of each coating and cleanup material employed in this emissions unit shall not exceed the following limits:

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<u>Coating/Cleanup</u>	<u>Pounds OC/gallon</u>
Enamel	4.8
Varnish (topcoat)	4.9

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Glaze	6.3
Toner	7.3
Cleanup/Thinner	6.7

- 2.b** The actual 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.

To ensure federal enforceability during the first twelve calendar months of operation following the issuance of this permit to install, the permittee shall not exceed the HAPs usage limits specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Single HAP Usage (Tons)</u>	<u>Maximum Allowable Combined HAP Usage (Tons)</u>
1	0.8	2.1
1-2	1.7	4.2
1-3	2.5	6.2
1-4	3.3	8.3
1-5	4.2	10.4
1-6	5.0	12.5
1-7	5.8	14.6
1-8	6.6	16.6
1-9	7.5	18.7
1-10	8.3	20.8
1-11	9.1	22.9
1-12	9.9	24.9

After the first 12 calendar months of operation following the issuance of this permit to install, compliance with the annual HAPs usage limit shall be based upon a rolling, twelve-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 Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by usage and emission limitations, OC content limitations and compliance with the Air Toxics Policy.

**B. Operational Restrictions**

1. The maximum daily usage rates for this emissions unit shall not exceed 10 gallons of enamel, 70 gallons of varnish, 50 gallons of glaze, 100 gallons of toner and 10 gallons of cleanup material/thinner.
2. The maximum annual usage rates for emissions units R001-R006 combined shall not exceed 960 gallons of enamel, 7,200 gallons of varnish, 5,000 gallons of glaze, 10,000 gallons of toner, and 1,031 gallons of cleanup material/thinner. The annual usage limits are based upon a rolling, 12-month summation of the usage figures.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the usage limits specified in the following table:

<u>Months</u>	<u>Maximum Allowable Cumulative Enamel Usage in gallons</u>	<u>Maximum Allowable Cumulative Varnish Usage in gallons</u>	<u>Maximum Allowable Cumulative Glaze Usage in gallons</u>	<u>Maximum Allowable Cumulative Toner Usage in gallons</u>	<u>Maximum Allowable Cumulative Cleanup/Thinner Usage in gallons</u>
1	80	600	416	833	85
1-2	160	1,200	832	1,666	170
1-3	240	1,800	1,248	2,499	255
1-4	320	2,400	1,664	3,332	340
1-5	400	3,000	2,080	4,165	425
1-6	480	3,600	2,496	4,998	510
1-7	560	4,200	2,912	5,831	595
1-8	640	4,800	3,328	6,664	680
1-9	720	5,400	3,744	7,497	765
1-10	800	6,000	4,160	8,330	850
1-11	880	6,600	4,576	9,163	935
1-12	960	7,200	5,000	10,000	1,031

After the first 12 calendar months of operation following the issuance of this permit, compliance

with the annual usage limits shall be based upon a rolling, 12-month summation of the usage figures.

3. The use of photochemically reactive material as defined in OAC rule 3745-21-01(C)(5) is prohibited.

### C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month:
  - a. The company identification of each liquid organic material employed in this emissions unit; and,
  - b. A record of each liquid organic material employed in this emissions unit indicating, whether or not the liquid organic material is photochemically reactive as identified in OAC rule 3745-21-01(C)(5).
2. The permittee shall collect and record the following information each month for the entire facility:
  - a. The name and identification number of each coating 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/thinner employed;
  - f. The individual HAP content for each HAP of each cleanup material/thinner, in pounds of individual HAP per gallon of cleanup material, as applied;
  - g. The total combined HAP content of each cleanup material/thinner, in pounds of combined HAPs per gallon of cleanup material/thinner, as applied [sum all the individual HAP contents from (f)];
  - h. The number of gallons of each cleanup material employed;
  - i. The total individual HAP usage for each HAP from all coatings and cleanup materials/thinner 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/thinner];
  - j. The total combined HAP usage from all coatings and cleanup materials/thinner employed,

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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/thinner];

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- k. The updated rolling, 12-month summation of usage for each individual HAP\*\*, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months. For the first twelve months following the issuance of the permit, this shall be a cumulative total for all months since the issuance of the PTI; and,
  - l. The updated rolling, 12-month summation of usage for total combined HAP\*\*, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months. For the first twelve months following the issuance of the permit, this shall be a cumulative total for all months since the issuance of the PTI.
- \* 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 HAP(s) emitted are the same as the amounts of HAP(s) used since all HAP(s) used evaporated.
3. The permittee shall collect and record the following information each day for emissions units R001-R006:
    - a. The company identification for each coating (enamel, varnish, glaze and toner) and cleanup material employed;
    - b. The OC content of each coating and cleanup material/thinner, in pounds per gallon, as applied;
    - c. The number of gallons of each coating and cleanup material employed.
    - d. The total combined OC emissions from all coatings and cleanup materials/thinner employed, in pounds per day [the sum of (b) times (c) for each coating and cleanup material/thinner];
  4. The permittee shall collect and record the following information each month for emissions units R001-R006:
    - a. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the usage figures for each coating (enamel, varnish, glaze and toner) and cleanup material employed, in gallons. Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall

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record the cumulative coating and cleanup material usage figures for each calendar month;  
and,

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- b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the total combined OC emissions from all coatings and cleanup materials employed, in pounds or tons. Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative total combined OC emissions for each calendar month.
5. The permit to install for this emissions unit R001 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: Isobutanol and Butanol

TLV ( $\mu\text{g}/\text{m}^3$ ): 151,600

Maximum Hourly Emission Rate (lbs/hr): 183.58

Predicted 1-Hour Maximum Ground-Level Concentration ( $\mu\text{g}/\text{m}^3$ ): 3388

MAGLC ( $\mu\text{g}/\text{m}^3$ ): 3609

Pollutant: Toluene

TLV ( $\mu\text{g}/\text{m}^3$ ): 188,000

Maximum Hourly Emission Rate (lbs/hr): 183.58

Predicted 1-Hour Maximum Ground-Level Concentration ( $\mu\text{g}/\text{m}^3$ ): 3388

MAGLC ( $\mu\text{g}/\text{m}^3$ ): 4476

Physical changes to or in the method of operation of the emissions unit after its installation or

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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

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shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

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

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.

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

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

**D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which identify each day during which any photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] was employed in

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this emissions unit. This report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of all OC emissions for each such day.

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2. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the actual usage of HAP limitations set forth in term A.2.b. The permittee shall submit annual reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year. If no exceedances occurred during the reporting period then a report is required stating so.
3. The permittee shall submit quarterly reports which specify the rolling, 12-month summation for coating (enamel, varnish, glaze and toner) and cleanup material usage figures for each month and the rolling, 12-month summation for total combined OC emissions from all coatings and cleanup materials employed for each month.
4. The permittee shall submit deviation (excursion) reports which identify each day during which the organic compound emissions from the coatings (enamel, varnish, glaze and toner) and cleanup material exceeded the limits set forth in Section A.1. of this permit, and the actual organic compound emission rate for each such day.
5. The permittee shall submit deviation (excursion) reports which identify each day during which the coating (enamel, varnish, glaze and toner) and cleanup usage rates exceeded the limits specified in Section B.1. of this permit, and the actual coating and cleanup usage rates for each such day.
6. The permittee shall submit deviation (excursion) reports which identify any daily record showing the use of any coating (enamel, varnish, glaze or toner) or cleanup material which does not comply with the limits in Section A.2.a. of this permit, and the actual OC content for each such coating or cleanup material.
7. The permittee shall also submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
8. The deviation and quarterly reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

**E. Testing Requirements**

1. Emission Limitation:  
OC content of 4.8 lbs/gallon for enamels employed;  
OC content of 4.9 lbs/gallon for varnishes employed;  
OC content of 6.3 lbs/gallon for glazes employed;

OC content of 7.3 lbs/gallon for toners employed; and  
OC content of 6.7 lbs/gallon for cleanup materials employed.

Applicable Compliance Method:

Formulation data or USEPA method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the OC contents of the coatings.

2. Emission Limitation:  
1436 lbs/day OC, from all coatings

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section C.3.

3. Emission Limitation:  
67.0 lbs/day OC, from cleanup materials

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section C.3.

4. Emission Limitation:  
75.65 TPY OC, including cleanup

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section C.3., and shall be the sum of the total daily OC emissions for the calendar year.

5. Emission Limitation:  
75.65 TPY OC, including cleanup, for R001-R006 combined, based upon a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Sections C.3. and C.4.

6. Emission Limitation:  
Actual usage of HAP limitations 9.9 TPY or less for any single HAP and 24.9 TPY or less for any combination of HAPs, as denoted in term A.2.b.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section C.2.

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7. Usage Limitations for coatings and cleanup materials/thinner for emissions units R001-R006 combined:

Less than 960 gallons enamel per year;  
Less than 7,200 gallons varnish per year;  
Less than 5,000 gallons glaze per year;  
Less than 10,000 gallons toner per year; and  
Less than 1,031 gallons cleanup materials per year.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Sections C.3. and C.4.

8. Usage Limitations for coatings and cleanup materials for emissions unit R001:

Less than 10 gallons enamel per day;  
Less than 70 gallons of varnish per day;  
Less than 50 gallons of glaze per day;  
Less than 100 gallons of toner per day; and  
Less than 10 gallons of cleanup material per day.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section C.3.

**F. Miscellaneous Requirements**

1. The preceding terms and conditions in Sections A. through F. shall supersede all the air pollution control requirements for emissions unit R001 contained in permit to install number 14-4297 as issued on June 11, 1997.
2. The following terms and conditions of this permit are federally enforceable, pursuant to OAC rule 3745-31-05(D): A.2.a., A.2.b., B.1. - B.3., C.1. - C.4., D.1.- D.6., and E.1 - E.8.

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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>
R002 - Paint Spray Booth with dry filter(Modification)	OAC rule 3745-31-05 (A)(3)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2).
		1436.0 lbs/day OC, from all coatings
		67.0 lbs/day OC, from cleanup materials
		See Section B.1.
	OAC rule 3745-31-05(D)	75.65 TPY OC, including cleanup, based upon a rolling, 12-month summation for emissions units R001-R006 combined
		See Sections A.2.a., A.2.b. and B.2.
	OAC rule 3745-21-07(G)(2)	Exempt from the requirements of this rule pursuant to term B.3.

**2. Additional Terms and Conditions**

- 2.a The organic compound (OC) content, as applied, of each coating and cleanup material employed in this emissions unit shall not exceed the following limits:

<u>Coating/Cleanup</u>	<u>Pounds OC/gallon</u>
Enamel	4.8
Varnish (topcoat)	4.9
Glaze	6.3
Toner	7.3
Cleanup/Thinner	6.7

- 2.b** The actual 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.

To ensure federal enforceability during the first twelve calendar months of operation following the issuance of this permit to install, the permittee shall not exceed the HAPs usage limits specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Single HAP Usage (Tons)</u>	<u>Maximum Allowable Combined HAP Usage (Tons)</u>
1	0.8	2.1
1-2	1.7	4.2
1-3	2.5	6.2
1-4	3.3	8.3
1-5	4.2	10.4
1-6	5.0	12.5
1-7	5.8	14.6
1-8	6.6	16.6
1-9	7.5	18.7
1-10	8.3	20.8
1-11	9.1	22.9
1-12	9.9	24.9

After the first 12 calendar months of operation following the issuance of this permit to install, compliance with the annual HAPs usage limit shall be based upon a rolling, twelve-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 Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by usage and emission limitations, OC content limitations and compliance with the Air Toxics Policy.

**B. Operational Restrictions**

1. The maximum daily usage rates for this emissions unit shall not exceed 10 gallons of enamel, 70 gallons of varnish, 50 gallons of glaze, 100 gallons of toner and 10 gallons of cleanup material/thinner.
2. The maximum annual usage rates for emissions units R001-R006 combined shall not exceed 960 gallons of enamel, 7,200 gallons of varnish, 5,000 gallons of glaze, 10,000 gallons of toner, and 1,031 gallons of cleanup material/thinner. The annual usage limits are based upon a rolling, 12-month summation of the usage figures.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the usage limits specified in the following table:

<u>Months</u>	<u>Maximum Allowable Cumulative Enamel Usage in gallons</u>	<u>Maximum Allowable Cumulative Varnish Usage in gallons</u>	<u>Maximum Allowable Cumulative Glaze Usage in gallons</u>	<u>Maximum Allowable Cumulative Toner Usage in gallons</u>	<u>Maximum Allowable Cumulative Cleanup/Thinner Usage in</u>
1	80	600	416	833	85
1-2	160	1,200	832	1,666	170
1-3	240	1,800	1,248	2,499	255
1-4	320	2,400	1,664	3,332	340
1-5	400	3,000	2,080	4,165	425
1-6	480	3,600	2,496	4,998	510
1-7	560	4,200	2,912	5,831	595
1-8	640	4,800	3,328	6,664	680
1-9	720	5,400	3,744	7,497	765
1-10	800	6,000	4,160	8,330	850
1-11	880	6,600	4,576	9,163	935
1-12	960	7,200	5,000	10,000	1,031

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual usage limits shall be based upon a rolling, 12-month summation of the usage

figures.

3. The use of photochemically reactive material as defined in OAC rule 3745-21-01(C)(5) is prohibited.

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

1. The permittee shall collect and record the following information each month:
  - a. The company identification of each liquid organic material employed in this emissions unit; and,
  - b. A record of each liquid organic material employed in this emissions unit indicating, whether or not the liquid organic material is photochemically reactive as identified in OAC rule 3745-21-01(C)(5).
2. The permittee shall collect and record the following information each month for the entire facility:
  - a. The name and identification number of each coating 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/thinner employed;
  - f. The individual HAP content for each HAP of each cleanup material/thinner, in pounds of individual HAP per gallon of cleanup material, as applied;
  - g. The total combined HAP content of each cleanup material/thinner, in pounds of combined HAPs per gallon of cleanup material/thinner, as applied [sum all the individual HAP contents from (f)];
  - h. The number of gallons of each cleanup material employed;
  - i. The total individual HAP usage for each HAP from all coatings and cleanup materials/thinner 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/thinner];
  - j. The total combined HAP usage from all coatings and cleanup materials/thinner employed,

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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/thinner];

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- k. The updated rolling, 12-month summation of usage for each individual HAP\*\*, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months. For the first twelve months following the issuance of the permit, this shall be a cumulative total for all months since the issuance of the PTI; and,
  - l. The updated rolling, 12-month summation of usage for total combined HAP\*\*, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months. For the first twelve months following the issuance of the permit, this shall be a cumulative total for all months since the issuance of the PTI.
- \* 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 HAP(s) emitted are the same as the amounts of HAP(s) used since all HAP(s) used evaporated.
3. The permittee shall collect and record the following information each day for emissions units R001-R006:
    - a. The company identification for each coating (enamel, varnish, glaze and toner) and cleanup material employed;
    - b. The OC content of each coating and cleanup material/thinner, in pounds per gallon, as applied;
    - c. The number of gallons of each coating and cleanup material employed;
    - d. The total combined OC emissions from all coatings and cleanup materials/thinner employed, in pounds per day [the sum of (b) times (c) for each coating and cleanup material/thinner].
  4. The permittee shall collect and record the following information each month for emissions units R001-R006:
    - a. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the usage figures for each coating (enamel, varnish, glaze and toner) and cleanup material employed, in gallons. Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall

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record the cumulative coating and cleanup material usage figures for each calendar month;  
and,

- b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the total combined OC emissions from all coatings and cleanup materials employed, in pounds or tons. Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative total combined OC emissions for each calendar month.
5. The permit to install for this emissions unit R002 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: Isobutanol and Butanol

TLV ( $\mu\text{g}/\text{m}^3$ ): 151,600

Maximum Hourly Emission Rate (lbs/hr): 183.58

Predicted 1-Hour Maximum Ground-Level Concentration ( $\mu\text{g}/\text{m}^3$ ): 3388

MAGLC ( $\mu\text{g}/\text{m}^3$ ): 3609

Pollutant: Toluene

TLV ( $\mu\text{g}/\text{m}^3$ ): 188,000

Maximum Hourly Emission Rate (lbs/hr): 183.58

Predicted 1-Hour Maximum Ground-Level Concentration ( $\mu\text{g}/\text{m}^3$ ): 3388

MAGLC ( $\mu\text{g}/\text{m}^3$ ): 4476

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"

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is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee

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shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

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

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.

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

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

**D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which identify each day during which any photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] was employed in

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this emissions unit. This report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of all OC emissions for each such day.

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2. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the actual usage of HAP limitations set forth in term A.2.b. The permittee shall submit annual reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year. If no exceedances occurred during the reporting period then a report is required stating so.
3. The permittee shall submit quarterly reports which specify the rolling, 12-month summation for coating (enamel, varnish, glaze and toner) and cleanup material usage figures for each month and the rolling, 12-month summation for total combined OC emissions from all coatings and cleanup materials employed for each month.
4. The permittee shall submit deviation (excursion) reports which identify each day during which the organic compound emissions from the coatings (enamel, varnish, glaze and toner) and cleanup material exceeded the limits set forth in Section A.1. of this permit, and the actual organic compound emission rate for each such day.
5. The permittee shall submit deviation (excursion) reports which identify each day during which the coating (enamel, varnish, glaze and toner) and cleanup usage rates exceeded the limits specified in Section B.1. of this permit, and the actual coating and cleanup usage rates for each such day.
6. The permittee shall submit deviation (excursion) reports which identify any daily record showing the use of any coating (enamel, varnish, glaze or toner) or cleanup material which does not comply with the limits in Section A.2.a. of this permit, and the actual OC content for each such coating or cleanup material.
7. The permittee shall also submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
8. The deviation and quarterly reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

**E. Testing Requirements**

1. Emission Limitation:  
OC content of 4.8 lbs/gallon for enamels employed;  
OC content of 4.9 lbs/gallon for varnishes employed;  
OC content of 6.3 lbs/gallon for glazes employed;  
OC content of 7.3 lbs/gallon for toners employed; and

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OC content of 6.7 lbs/gallon for cleanup materials employed.

Applicable Compliance Method:

Formulation data or USEPA method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the OC contents of the coatings.

2. Emission Limitation:  
1436 lbs/day OC, from all coatings

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section C.3.

3. Emission Limitation:  
67.0 lbs/day OC, from cleanup materials

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section C.3.

4. Emission Limitation:  
75.65 TPY OC, including cleanup

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section C.3., and shall be the sum of the total daily OC emissions for the calendar year.

5. Emission Limitation:  
75.65 TPY OC, including cleanup, for R001-R006 combined, based upon a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Sections C.3. and C.4.

6. Emission Limitation:  
Actual usage of HAP limitations 9.9 TPY or less for any single HAP and 24.9 TPY or less for any combination of HAPs, as denoted in term A.2.b.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section C.2.

7. Usage Limitations for coatings and cleanup materials/thinner for emissions units R001-R006 combined:

Less than 960 gallons enamel per year;  
Less than 7,200 gallons varnish per year;  
Less than 5,000 gallons glaze per year;  
Less than 10,000 gallons toner per year; and  
Less than 1,031 gallons cleanup materials per year.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Sections C.3. and C.4.

8. Usage Limitations for coatings and cleanup materials for emissions unit R002:

Less than 10 gallons enamel per day;  
Less than 70 gallons of varnish per day;  
Less than 50 gallons of glaze per day;  
Less than 100 gallons of toner per day; and  
Less than 10 gallons of cleanup material per day.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section C.3.

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

1. The preceding terms and conditions in Sections A. through F. shall supersede all the air pollution control requirements for emissions unit R001 contained in permit to install number 14-4297 as issued on June 11, 1997.
2. The following terms and conditions of this permit are federally enforceable, pursuant to OAC rule 3745-31-05(D): A.2.a., A.2.b., B.1. - B.3., C.1. - C.4., D.1.- D.6., and E.1 - E.8.

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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>
R003 - Paint Spray Booth with dry filter (Modification)	OAC rule 3745-31-05 (A)(3)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2).
		1436.0 lbs/day OC, from all coatings
		67.0 lbs/day OC, from cleanup materials
	OAC rule 3745-31-05(D)	See Section B.1.
		75.65 TPY OC, including cleanup, based upon a rolling, 12-month summation for emissions units R001-R006 combined
	OAC rule 3745-21-07(G)(2)	See Sections A.2.a., A.2.b. and B.2.
		Exempt from the requirements of this rule pursuant to term B.3.

**2. Additional Terms and Conditions**

- 2.a The organic compound (OC) content, as applied, of each coating and cleanup material employed in this emissions unit shall not exceed the following limits:

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<u>Coating/Cleanup</u>	<u>Pounds OC/gallon</u>
Enamel	4.8
Varnish (topcoat)	4.9
Glaze	6.3
Toner	7.3
Cleanup/Thinner	6.7

- 2.b** The actual 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.

To ensure federal enforceability during the first twelve calendar months of operation following the issuance of this permit to install, the permittee shall not exceed the HAPs usage limits specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Single HAP Usage (Tons)</u>	<u>Maximum Allowable Combined HAP Usage (Tons)</u>
1	0.8	2.1
1-2	1.7	4.2
1-3	2.5	6.2
1-4	3.3	8.3
1-5	4.2	10.4
1-6	5.0	12.5
1-7	5.8	14.6
1-8	6.6	16.6
1-9	7.5	18.7
1-10	8.3	20.8
1-11	9.1	22.9
1-12	9.9	24.9

After the first 12 calendar months of operation following the issuance of this permit to install, compliance with the annual HAPs usage limit shall be based upon a rolling, twelve-month summation.

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

- 2.c** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by usage and emission limitations, OC content limitations and compliance with the Air Toxics Policy.

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**B. Operational Restrictions**

1. The maximum daily usage rates for this emissions unit shall not exceed 10 gallons of enamel, 70 gallons of varnish, 50 gallons of glaze, 100 gallons of toner and 10 gallons of cleanup material/thinner.
2. The maximum annual usage rates for emissions units R001-R006 combined shall not exceed 960 gallons of enamel, 7,200 gallons of varnish, 5,000 gallons of glaze, 10,000 gallons of toner, and 1,031 gallons of cleanup material/thinner. The annual usage limits are based upon a rolling, 12-month summation of the usage figures.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the usage limits specified in the following table:

<u>Months</u>	<u>Maximum Allowable Cumulative Enamel Usage in gallons</u>	<u>Maximum Allowable Cumulative Varnish Usage in gallons</u>	<u>Maximum Allowable Cumulative Glaze Usage in gallons</u>	<u>Maximum Allowable Cumulative Toner Usage in gallons</u>	<u>Maximum Allowable Cumulative Cleanup/Thinner Usage in gallons</u>
1	80	600	416	833	85
1-2	160	1,200	832	1,666	170
1-3	240	1,800	1,248	2,499	255
1-4	320	2,400	1,664	3,332	340
1-5	400	3,000	2,080	4,165	425
1-6	480	3,600	2,496	4,998	510
1-7	560	4,200	2,912	5,831	595
1-8	640	4,800	3,328	6,664	680
1-9	720	5,400	3,744	7,497	765
1-10	800	6,000	4,160	8,330	850
1-11	880	6,600	4,576	9,163	935
1-12	960	7,200	5,000	10,000	1,031

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual usage limits shall be based upon a rolling, 12-month summation of the usage figures.

3. The use of photochemically reactive material as defined in OAC rule 3745-21-01(C)(5) is

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

1. The permittee shall collect and record the following information each month:
  - a. The company identification of each liquid organic material employed in this emissions unit; and,
  - b. A record of each liquid organic material employed in this emissions unit indicating, whether or not the liquid organic material is photochemically reactive as identified in OAC rule 3745-21-01(C)(5).
  
2. The permittee shall collect and record the following information each month for the entire facility:
  - a. The name and identification number of each coating 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/thinner employed;
  - f. The individual HAP content for each HAP of each cleanup material/thinner, in pounds of individual HAP per gallon of cleanup material, as applied;
  - g. The total combined HAP content of each cleanup material/thinner, in pounds of combined HAPs per gallon of cleanup material/thinner, as applied [sum all the individual HAP contents from (f)];
  - h. The number of gallons of each cleanup material employed;
  - i. The total individual HAP usage for each HAP from all coatings and cleanup materials/thinner 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/thinner];
  - j. The total combined HAP usage from all coatings and cleanup materials/thinner employed, in pounds or tons per month [the sum of (c) times (d) for each coating plus the sum of (g)

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times (h) for each cleanup material/thinner];

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- k. The updated rolling, 12-month summation of usage for each individual HAP\*\*, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months. For the first twelve months following the issuance of the permit, this shall be a cumulative total for all months since the issuance of the PTI; and,
  - l. The updated rolling, 12-month summation of usage for total combined HAP\*\*, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months. For the first twelve months following the issuance of the permit, this shall be a cumulative total for all months since the issuance of the PTI.
  - \* 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 HAP(s) emitted are the same as the amounts of HAP(s) used since all HAP(s) used evaporated.
3. The permittee shall collect and record the following information each day for emissions units R001-R006:
- a. The company identification for each coating (enamel, varnish, glaze and toner) and cleanup material employed;
  - b. The OC content of each coating and cleanup material/thinner, in pounds per gallon, as applied;
  - c. The number of gallons of each coating and cleanup material employed;
  - d. The total combined OC emissions from all coatings and cleanup materials/thinner employed, in pounds per day [the sum of (b) times (c) for each coating and cleanup material/thinner];
4. The permittee shall collect and record the following information each month for emissions units R001-R006:
- a. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the usage figures for each coating (enamel, varnish, glaze and toner) and cleanup material employed, in gallons. Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative coating and cleanup material usage figures for each calendar month;

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and,

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- b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the total combined OC emissions from all coatings and cleanup materials employed, in pounds or tons. Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative total combined OC emissions for each calendar month.
5. The permit to install for this emissions unit R003 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: Isobutanol and Butanol

TLV ( $\mu\text{g}/\text{m}^3$ ): 151,600

Maximum Hourly Emission Rate (lbs/hr): 183.58

Predicted 1-Hour Maximum Ground-Level Concentration ( $\mu\text{g}/\text{m}^3$ ): 3388

MAGLC ( $\mu\text{g}/\text{m}^3$ ): 3609

Pollutant: Toluene

TLV ( $\mu\text{g}/\text{m}^3$ ): 188,000

Maximum Hourly Emission Rate (lbs/hr): 183.58

Predicted 1-Hour Maximum Ground-Level Concentration ( $\mu\text{g}/\text{m}^3$ ): 3388

MAGLC ( $\mu\text{g}/\text{m}^3$ ): 4476

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

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permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

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

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.

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

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

**D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which identify each day during which any photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] was employed in

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this emissions unit. This report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of all OC emissions for each such day.

2. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the actual usage of HAP limitations set forth in term A.2.b. The permittee shall submit annual reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year. If no exceedances occurred during the reporting period then a report is required stating so.

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3. The permittee shall submit quarterly reports which specify the rolling, 12-month summation for coating (enamel, varnish, glaze and toner) and cleanup material usage figures for each month and the rolling, 12-month summation for total combined OC emissions from all coatings and cleanup materials employed for each month.
4. The permittee shall submit deviation (excursion) reports which identify each day during which the organic compound emissions from the coatings (enamel, varnish, glaze and toner) and cleanup material exceeded the limits set forth in Section A.1. of this permit, and the actual organic compound emission rate for each such day.
5. The permittee shall submit deviation (excursion) reports which identify each day during which the coating (enamel, varnish, glaze and toner) and cleanup usage rates exceeded the limits specified in Section B.1. of this permit, and the actual coating and cleanup usage rates for each such day.
6. The permittee shall submit deviation (excursion) reports which identify any daily record showing the use of any coating (enamel, varnish, glaze or toner) or cleanup material which does not comply with the limits in Section A.2.a. of this permit, and the actual OC content for each such coating or cleanup material.
7. The permittee shall also submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
8. The deviation and quarterly reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

**E. Testing Requirements**

1. Emission Limitation:  
OC content of 4.8 lbs/gallon for enamels employed;  
OC content of 4.9 lbs/gallon for varnishes employed;  
OC content of 6.3 lbs/gallon for glazes employed;  
OC content of 7.3 lbs/gallon for toners employed; and  
OC content of 6.7 lbs/gallon for cleanup materials employed.

Applicable Compliance Method:

Formulation data or USEPA method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the OC contents of the coatings.

2. Emission Limitation:

1436 lbs/day OC, from all coatings

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section C.3.

3. Emission Limitation:  
67.0 lbs/day OC, from cleanup materials

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section C.3.

4. Emission Limitation:  
75.65 TPY OC, including cleanup

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section C.3., and shall be the sum of the total daily OC emissions for the calendar year.

5. Emission Limitation:  
75.65 TPY OC, including cleanup, for R001-R006 combined, based upon a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Sections C.3. and C.4.

6. Emission Limitation:  
Actual usage of HAP limitations 9.9 TPY or less for any single HAP and 24.9 TPY or less for any combination of HAPs, as denoted in term A.2.b.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section C.2.

7. Usage Limitations for coatings and cleanup materials/thinner for emissions units R001-R006 combined:

Less than 960 gallons enamel per year;  
Less than 7,200 gallons varnish per year;  
Less than 5,000 gallons glaze per year;  
Less than 10,000 gallons toner per year; and  
Less than 1,031 gallons cleanup materials per year.

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Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Sections C.3. and C.4.

8. Usage Limitations for coatings and cleanup materials for emissions unit R003:

Less than 10 gallons enamel per day;

Less than 70 gallons of varnish per day;

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Less than 50 gallons of glaze per day;  
Less than 100 gallons of toner per day; and  
Less than 10 gallons of cleanup material per day.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section C.3.

**F. Miscellaneous Requirements**

1. The preceding terms and conditions in Sections A. through F. shall supersede all the air pollution control requirements for emissions unit R001 contained in permit to install number 14-4297 as issued on June 11, 1997.
2. The following terms and conditions of this permit are federally enforceable, pursuant to OAC rule 3745-31-05(D): A.2.a., A.2.b., B.1. - B.3., C.1. - C.4., D.1.- D.6., and E.1 - E.8.

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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>
R004 - Paint Spray Booth with dry filter (Modification)	OAC rule 3745-31-05 (A)(3)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2).
		1436.0 lbs/day OC, from all coatings
		67.0 lbs/day OC, from cleanup materials
		See Section B.1.
	OAC rule 3745-31-05(D)	75.65 TPY OC, including cleanup, based upon a rolling, 12-month summation for emissions units R001-R006 combined
		See Sections A.2.a., A.2.b. and B.2.
	OAC rule 3745-21-07(G)(2)	Exempt from the requirements of this rule pursuant to term B.3.

**2. Additional Terms and Conditions**

- 2.a The organic compound (OC) content, as applied, of each coating and cleanup material employed in this emissions unit shall not exceed the following limits:

<u>Coating/Cleanup</u>	<u>Pounds OC/gallon</u>
Enamel	4.8
Varnish (topcoat)	4.9
Glaze	6.3
Toner	7.3
Cleanup/Thinner	6.7

- 2.b** The actual 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.

To ensure federal enforceability during the first twelve calendar months of operation following the issuance of this permit to install, the permittee shall not exceed the HAPs usage limits specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Single HAP Usage (Tons)</u>	<u>Maximum Allowable Combined HAP Usage (Tons)</u>
1	0.8	2.1
1-2	1.7	4.2
1-3	2.5	6.2
1-4	3.3	8.3
1-5	4.2	10.4
1-6	5.0	12.5
1-7	5.8	14.6
1-8	6.6	16.6
1-9	7.5	18.7
1-10	8.3	20.8
1-11	9.1	22.9
1-12	9.9	24.9

After the first 12 calendar months of operation following the issuance of this permit to install, compliance with the annual HAPs usage limit shall be based upon a rolling, twelve-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 Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by usage and emission limitations, OC content limitations and compliance with the Air Toxics Policy.

**B. Operational Restrictions**

1. The maximum daily usage rates for this emissions unit shall not exceed 10 gallons of enamel, 70 gallons of varnish, 50 gallons of glaze, 100 gallons of toner and 10 gallons of cleanup material/thinner.
2. The maximum annual usage rates for emissions units R001-R006 combined shall not exceed 960 gallons of enamel, 7,200 gallons of varnish, 5,000 gallons of glaze, 10,000 gallons of toner, and 1,031 gallons of cleanup material/thinner. The annual usage limits are based upon a rolling, 12-month summation of the usage figures.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the usage limits specified in the following table:

<u>Months</u>	<u>Maximum Allowable Cumulative Enamel Usage in gallons</u>	<u>Maximum Allowable Cumulative Varnish Usage in gallons</u>	<u>Maximum Allowable Cumulative Glaze Usage in gallons</u>	<u>Maximum Allowable Cumulative Toner Usage in gallons</u>	<u>Maximum Allowable Cumulative Cleanup/Thinner Usage in</u>
1	80	600	416	833	85
1-2	160	1,200	832	1,666	170
1-3	240	1,800	1,248	2,499	255
1-4	320	2,400	1,664	3,332	340
1-5	400	3,000	2,080	4,165	425
1-6	480	3,600	2,496	4,998	510
1-7	560	4,200	2,912	5,831	595
1-8	640	4,800	3,328	6,664	680
1-9	720	5,400	3,744	7,497	765
1-10	800	6,000	4,160	8,330	850
1-11	880	6,600	4,576	9,163	935
1-12	960	7,200	5,000	10,000	1,031

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual usage limits shall be based upon a rolling, 12-month summation of the usage

figures.

3. The use of photochemically reactive material as defined in OAC rule 3745-21-01(C)(5) is prohibited.

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

1. The permittee shall collect and record the following information each month:
  - a. The company identification of each liquid organic material employed in this emissions unit; and,
  - b. A record of each liquid organic material employed in this emissions unit indicating, whether or not the liquid organic material is photochemically reactive as identified in OAC rule 3745-21-01(C)(5).
2. The permittee shall collect and record the following information each month for the entire facility:
  - a. The name and identification number of each coating 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/thinner employed;
  - f. The individual HAP content for each HAP of each cleanup material/thinner, in pounds of individual HAP per gallon of cleanup material, as applied;
  - g. The total combined HAP content of each cleanup material/thinner, in pounds of combined HAPs per gallon of cleanup material/thinner, as applied [sum all the individual HAP contents from (f)];
  - h. The number of gallons of each cleanup material employed;
  - i. The total individual HAP usage for each HAP from all coatings and cleanup materials/thinner 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/thinner];
  - j. The total combined HAP usage from all coatings and cleanup materials/thinner employed,

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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/thinner];

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- k. The updated rolling, 12-month summation of usage for each individual HAP\*\*, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months. For the first twelve months following the issuance of the permit, this shall be a cumulative total for all months since the issuance of the PTI; and,
  - l. The updated rolling, 12-month summation of usage for total combined HAP\*\*, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months. For the first twelve months following the issuance of the permit, this shall be a cumulative total for all months since the issuance of the PTI.
    - \* 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 HAP(s) emitted are the same as the amounts of HAP(s) used since all HAP(s) used evaporated.
3. The permittee shall collect and record the following information each day for emissions units R001-R006:
    - a. The company identification for each coating (enamel, varnish, glaze and toner) and cleanup material employed;
    - b. The OC content of each coating and cleanup material/thinner, in pounds per gallon, as applied;
    - c. The number of gallons of each coating and cleanup material employed;
    - d. The total combined OC emissions from all coatings and cleanup materials/thinner employed, in pounds per day [the sum of (b) times (c) for each coating and cleanup material/thinner].
  4. The permittee shall collect and record the following information each month for emissions units R001-R006:
    - a. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the usage figures for each coating (enamel, varnish, glaze and toner) and cleanup material employed, in gallons. Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall

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record the cumulative coating and cleanup material usage figures for each calendar month;  
and,

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- b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the total combined OC emissions from all coatings and cleanup materials employed, in pounds or tons. Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative total combined OC emissions for each calendar month.
5. The permit to install for this emissions unit R004 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: Isobutanol and Butanol

TLV ( $\mu\text{g}/\text{m}^3$ ): 151,600

Maximum Hourly Emission Rate (lbs/hr): 183.58

Predicted 1-Hour Maximum Ground-Level Concentration ( $\mu\text{g}/\text{m}^3$ ): 3388

MAGLC ( $\mu\text{g}/\text{m}^3$ ): 3609

Pollutant: Toluene

TLV ( $\mu\text{g}/\text{m}^3$ ): 188,000

Maximum Hourly Emission Rate (lbs/hr): 183.58

Predicted 1-Hour Maximum Ground-Level Concentration ( $\mu\text{g}/\text{m}^3$ ): 3388

MAGLC ( $\mu\text{g}/\text{m}^3$ ): 4476

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

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permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

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

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.

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

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

**D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which identify each day during which any photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] was employed in

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this emissions unit. This report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of all OC emissions for each such day.

2. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the actual usage of HAP limitations set forth in term A.2.b. The permittee shall submit annual reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year. If no exceedances occurred during the reporting period then a report is required stating so.

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3. The permittee shall submit quarterly reports which specify the rolling, 12-month summation for coating (enamel, varnish, glaze and toner) and cleanup material usage figures for each month and the rolling, 12-month summation for total combined OC emissions from all coatings and cleanup materials employed for each month.
4. The permittee shall submit deviation (excursion) reports which identify each day during which the organic compound emissions from the coatings (enamel, varnish, glaze and toner) and cleanup material exceeded the limits set forth in Section A.1. of this permit, and the actual organic compound emission rate for each such day.
5. The permittee shall submit deviation (excursion) reports which identify each day during which the coating (enamel, varnish, glaze and toner) and cleanup usage rates exceeded the limits specified in Section B.1. of this permit, and the actual coating and cleanup usage rates for each such day.
6. The permittee shall submit deviation (excursion) reports which identify any daily record showing the use of any coating (enamel, varnish, glaze or toner) or cleanup material which does not comply with the limits in Section A.2.a. of this permit, and the actual OC content for each such coating or cleanup material.
7. The permittee shall also submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
8. The deviation and quarterly reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

**E. Testing Requirements**

1. Emission Limitation:  
OC content of 4.8 lbs/gallon for enamels employed;  
OC content of 4.9 lbs/gallon for varnishes employed;  
OC content of 6.3 lbs/gallon for glazes employed;  
OC content of 7.3 lbs/gallon for toners employed; and  
OC content of 6.7 lbs/gallon for cleanup materials employed.

Applicable Compliance Method:

Formulation data or USEPA method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the OC contents of the coatings.

2. Emission Limitation:

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1436 lbs/day OC, from all coatings

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section C.3.

3. Emission Limitation:  
67.0 lbs/day OC, from cleanup materials

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section C.3.

4. Emission Limitation:  
75.65 TPY OC, including cleanup

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section C.3., and shall be the sum of the total daily OC emissions for the calendar year.

5. Emission Limitation:  
75.65 TPY OC, including cleanup, for R001-R006 combined, based upon a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Sections C.3. and C.4.

6. Emission Limitation:  
Actual usage of HAP limitations 9.9 TPY or less for any single HAP and 24.9 TPY or less for any combination of HAPs, as denoted in term A.2.b.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section C.2.

7. Usage Limitations for coatings and cleanup materials/thinner for emissions units R001-R006 combined:

Less than 960 gallons enamel per year;  
Less than 7,200 gallons varnish per year;  
Less than 5,000 gallons glaze per year;  
Less than 10,000 gallons toner per year; and

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Less than 1,031 gallons cleanup materials per year.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Sections C.3. and C.4.

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8. Usage Limitations for coatings and cleanup materials for emissions unit R004:

Less than 10 gallons enamel per day;  
Less than 70 gallons of varnish per day;  
Less than 50 gallons of glaze per day;  
Less than 100 gallons of toner per day; and  
Less than 10 gallons of cleanup material per day.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section C.3.

**F. Miscellaneous Requirements**

1. The preceding terms and conditions in Sections A. through F. shall supersede all the air pollution control requirements for emissions unit R001 contained in permit to install number 14-4297 as issued on June 11, 1997.
2. The following terms and conditions of this permit are federally enforceable, pursuant to OAC rule 3745-31-05(D): A.2.a., A.2.b., B.1. - B.3., C.1. - C.4., D.1.- D.6., and E.1 - E.8.

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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>
R005 - Paint Spray Booth with dry filter (Modification)	OAC rule 3745-31-05 (A)(3)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2).
		1436.0 lbs/day OC, from all coatings
		67.0 lbs/day OC, from cleanup materials
		See Section B.1.
	OAC rule 3745-31-05(D)	75.65 TPY OC, including cleanup, based upon a rolling, 12-month summation for emissions units R001-R006 combined
		See Sections A.2.a., A.2.b. and B.2.
	OAC rule 3745-21-07(G)(2)	Exempt from the requirements of this rule pursuant to term B.3.

**2. Additional Terms and Conditions**

- 2.a The organic compound (OC) content, as applied, of each coating and cleanup material employed in this emissions unit shall not exceed the following limits:

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<u>Coating/Cleanup</u>	<u>Pounds OC/gallon</u>
Enamel	4.8
Varnish (topcoat)	4.9
Glaze	6.3
Toner	7.3
Cleanup/Thinner	6.7

- 2.b** The actual 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.

To ensure federal enforceability during the first twelve calendar months of operation following the issuance of this permit to install, the permittee shall not exceed the HAPs usage limits specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Single HAP Usage (Tons)</u>	<u>Maximum Allowable Combined HAP Usage (Tons)</u>
1	0.8	2.1
1-2	1.7	4.2
1-3	2.5	6.2
1-4	3.3	8.3
1-5	4.2	10.4
1-6	5.0	12.5
1-7	5.8	14.6
1-8	6.6	16.6
1-9	7.5	18.7
1-10	8.3	20.8
1-11	9.1	22.9
1-12	9.9	24.9

After the first 12 calendar months of operation following the issuance of this permit to install, compliance with the annual HAPs usage limit shall be based upon a rolling, twelve-month summation.

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

Emissions Unit ID: **R005**

**2.c** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by usage and emission limitations, OC content limitations and compliance with the Air Toxics Policy.

**B. Operational Restrictions**

1. The maximum daily usage rates for this emissions unit shall not exceed 10 gallons of enamel, 70 gallons of varnish, 50 gallons of glaze, 100 gallons of toner and 10 gallons of cleanup material/thinner.
2. The maximum annual usage rates for emissions units R001-R006 combined shall not exceed 960 gallons of enamel, 7,200 gallons of varnish, 5,000 gallons of glaze, 10,000 gallons of toner, and 1,031 gallons of cleanup material/thinner. The annual usage limits are based upon a rolling, 12-month summation of the usage figures.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the usage limits specified in the following table:

<u>Months</u>	<u>Maximum Allowable Cumulative Enamel Usage in gallons</u>	<u>Maximum Allowable Cumulative Varnish Usage in gallons</u>	<u>Maximum Allowable Cumulative Glaze Usage in gallons</u>	<u>Maximum Allowable Cumulative Toner Usage in gallons</u>	<u>Maximum Allowable Cumulative Cleanup/Thinner Usage in</u>
1	80	600	416	833	85
1-2	160	1,200	832	1,666	170
1-3	240	1,800	1,248	2,499	255
1-4	320	2,400	1,664	3,332	340
1-5	400	3,000	2,080	4,165	425
1-6	480	3,600	2,496	4,998	510
1-7	560	4,200	2,912	5,831	595
1-8	640	4,800	3,328	6,664	680
1-9	720	5,400	3,744	7,497	765
1-10	800	6,000	4,160	8,330	850
1-11	880	6,600	4,576	9,163	935
1-12	960	7,200	5,000	10,000	1,031

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual usage limits shall be based upon a rolling, 12-month summation of the usage figures.

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3. The use of photochemically reactive material as defined in OAC rule 3745-21-01(C)(5) is prohibited.

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

1. The permittee shall collect and record the following information each month:
  - a. The company identification of each liquid organic material employed in this emissions unit; and,
  - b. A record of each liquid organic material employed in this emissions unit indicating, whether or not the liquid organic material is photochemically reactive as identified in OAC rule 3745-21-01(C)(5).
2. The permittee shall collect and record the following information each month for the entire facility:
  - a. The name and identification number of each coating 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/thinner employed;
  - f. The individual HAP content for each HAP of each cleanup material/thinner, in pounds of individual HAP per gallon of cleanup material, as applied;
  - g. The total combined HAP content of each cleanup material/thinner, in pounds of combined HAPs per gallon of cleanup material/thinner, as applied [sum all the individual HAP contents from (f)];
  - h. The number of gallons of each cleanup material employed;
  - i. The total individual HAP usage for each HAP from all coatings and cleanup materials/thinner 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/thinner];
  - j. The total combined HAP usage from all coatings and cleanup materials/thinner employed,

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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/thinner];

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- k. The updated rolling, 12-month summation of usage for each individual HAP\*\*, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months. For the first twelve months following the issuance of the permit, this shall be a cumulative total for all months since the issuance of the PTI; and,
  - l. The updated rolling, 12-month summation of usage for total combined HAP\*\*, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months. For the first twelve months following the issuance of the permit, this shall be a cumulative total for all months since the issuance of the PTI.
- \* 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 HAP(s) emitted are the same as the amounts of HAP(s) used since all HAP(s) used evaporated.
3. The permittee shall collect and record the following information each day for emissions units R001-R006:
    - a. The company identification for each coating (enamel, varnish, glaze and toner) and cleanup material employed;
    - b. The OC content of each coating and cleanup material/thinner, in pounds per gallon, as applied;
    - c. The number of gallons of each coating and cleanup material employed;
    - d. The total combined OC emissions from all coatings and cleanup materials/thinner employed, in pounds per day [the sum of (b) times (c) for each coating and cleanup material/thinner].
  4. The permittee shall collect and record the following information each month for emissions units R001-R006:
    - a. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the usage figures for each coating (enamel, varnish, glaze and toner) and cleanup material employed, in gallons. Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall

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record the cumulative coating and cleanup material usage figures for each calendar month;  
and,

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- b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the total combined OC emissions from all coatings and cleanup materials employed, in pounds or tons. Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative total combined OC emissions for each calendar month.
5. The permit to install for this emissions unit R005 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: Isobutanol and Butanol

TLV ( $\mu\text{g}/\text{m}^3$ ): 151,600

Maximum Hourly Emission Rate (lbs/hr): 183.58

Predicted 1-Hour Maximum Ground-Level Concentration ( $\mu\text{g}/\text{m}^3$ ): 3388

MAGLC ( $\mu\text{g}/\text{m}^3$ ): 3609

Pollutant: Toluene

TLV ( $\mu\text{g}/\text{m}^3$ ): 188,000

Maximum Hourly Emission Rate (lbs/hr): 183.58

Predicted 1-Hour Maximum Ground-Level Concentration ( $\mu\text{g}/\text{m}^3$ ): 3388

MAGLC ( $\mu\text{g}/\text{m}^3$ ): 4476

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"

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is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

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

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.

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

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

**D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which identify each day during which any

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photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit. This report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of all OC emissions for each such day.

2. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the actual usage of HAP limitations set forth in term A.2.b. The permittee shall submit annual reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year. If no exceedances occurred during the reporting period then a report is required stating so.

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3. The permittee shall submit quarterly reports which specify the rolling, 12-month summation for coating (enamel, varnish, glaze and toner) and cleanup material usage figures for each month and the rolling, 12-month summation for total combined OC emissions from all coatings and cleanup materials employed for each month.
4. The permittee shall submit deviation (excursion) reports which identify each day during which the organic compound emissions from the coatings (enamel, varnish, glaze and toner) and cleanup material exceeded the limits set forth in Section A.1. of this permit, and the actual organic compound emission rate for each such day.
5. The permittee shall submit deviation (excursion) reports which identify each day during which the coating (enamel, varnish, glaze and toner) and cleanup usage rates exceeded the limits specified in Section B.1. of this permit, and the actual coating and cleanup usage rates for each such day.
6. The permittee shall submit deviation (excursion) reports which identify any daily record showing the use of any coating (enamel, varnish, glaze or toner) or cleanup material which does not comply with the limits in Section A.2.a. of this permit, and the actual OC content for each such coating or cleanup material.
7. The permittee shall also submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
8. The deviation and quarterly reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

**E. Testing Requirements**

1. Emission Limitation:  
OC content of 4.8 lbs/gallon for enamels employed;  
OC content of 4.9 lbs/gallon for varnishes employed;  
OC content of 6.3 lbs/gallon for glazes employed;  
OC content of 7.3 lbs/gallon for toners employed; and  
OC content of 6.7 lbs/gallon for cleanup materials employed.

Applicable Compliance Method:

Formulation data or USEPA method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the OC contents of the coatings.

2. Emission Limitation:

1436 lbs/day OC, from all coatings

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section C.3.

3. Emission Limitation:  
67.0 lbs/day OC, from cleanup materials

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section C.3.

4. Emission Limitation:  
75.65 TPY OC, including cleanup

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section C.3., and shall be the sum of the total daily OC emissions for the calendar year.

5. Emission Limitation:  
75.65 TPY OC, including cleanup, for R001-R006 combined, based upon a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Sections C.3. and C.4.

6. Emission Limitation:  
Actual usage of HAP limitations 9.9 TPY or less for any single HAP and 24.9 TPY or less for any combination of HAPs, as denoted in term A.2.b.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section C.2.

7. Usage Limitations for coatings and cleanup materials/thinner for emissions units R001-R006 combined:

Less than 960 gallons enamel per year;  
Less than 7,200 gallons varnish per year;  
Less than 5,000 gallons glaze per year;  
Less than 10,000 gallons toner per year; and  
Less than 1,031 gallons cleanup materials per year.

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Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Sections C.3. and C.4.

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8. Usage Limitations for coatings and cleanup materials for emissions unit R005:

Less than 10 gallons enamel per day;  
Less than 70 gallons of varnish per day;  
Less than 50 gallons of glaze per day;  
Less than 100 gallons of toner per day; and  
Less than 10 gallons of cleanup material per day.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section C.3.

**F. Miscellaneous Requirements**

1. The preceding terms and conditions in Sections A. through F. shall supersede all the air pollution control requirements for emissions unit R001 contained in permit to install number 14-4297 as issued on June 11, 1997.
2. The following terms and conditions of this permit are federally enforceable, pursuant to OAC rule 3745-31-05(D): A.2.a., A.2.b., B.1. - B.3., C.1. - C.4., D.1.- D.6., and E.1 - E.8.

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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>
R006 - Paint Spray Booth with dry filter (Modification)	OAC rule 3745-31-05 (A)(3)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2).
		1436.0 lbs/day OC, from all coatings
		67.0 lbs/day OC, from cleanup materials
		See Section B.1.
	OAC rule 3745-31-05(D)	75.65 TPY OC, including cleanup, based upon a rolling, 12-month summation for emissions units R001-R006 combined
		See Sections A.2.a., A.2.b. and B.2.
	OAC rule 3745-21-07(G)(2)	Exempt from the requirements of this rule pursuant to term B.3.

**2. Additional Terms and Conditions**

- 2.a The organic compound (OC) content, as applied, of each coating and cleanup material employed in this emissions unit shall not exceed the following limits:

<u>Coating/Cleanup</u>	<u>Pounds OC/gallon</u>
Enamel	4.8
Varnish (topcoat)	4.9
Glaze	6.3
Toner	7.3
Cleanup/Thinner	6.7

- 2.b** The actual 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.

To ensure federal enforceability during the first twelve calendar months of operation following the issuance of this permit to install, the permittee shall not exceed the HAPs usage limits specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Single HAP Usage (Tons)</u>	<u>Maximum Allowable Combined HAP Usage (Tons)</u>
1	0.8	2.1
1-2	1.7	4.2
1-3	2.5	6.2
1-4	3.3	8.3
1-5	4.2	10.4
1-6	5.0	12.5
1-7	5.8	14.6
1-8	6.6	16.6
1-9	7.5	18.7
1-10	8.3	20.8
1-11	9.1	22.9
1-12	9.9	24.9

After the first 12 calendar months of operation following the issuance of this permit to install, compliance with the annual HAPs usage limit shall be based upon a rolling, twelve-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 Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by usage and emission limitations, OC content limitations and compliance with the Air Toxics Policy.

**B. Operational Restrictions**

1. The maximum daily usage rates for this emissions unit shall not exceed 10 gallons of enamel, 70 gallons of varnish, 50 gallons of glaze, 100 gallons of toner and 10 gallons of cleanup material/thinner.
2. The maximum annual usage rates for emissions units R001-R006 combined shall not exceed 960 gallons of enamel, 7,200 gallons of varnish, 5,000 gallons of glaze, 10,000 gallons of toner, and 1,031 gallons of cleanup material/thinner. The annual usage limits are based upon a rolling, 12-month summation of the usage figures.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the usage limits specified in the following table:

<u>Months</u>	<u>Maximum Allowable Cumulative Enamel Usage in gallons</u>	<u>Maximum Allowable Cumulative Varnish Usage in gallons</u>	<u>Maximum Allowable Cumulative Glaze Usage in gallons</u>	<u>Maximum Allowable Cumulative Toner Usage in gallons</u>	<u>Maximum Allowable Cumulative Cleanup/Thinner Usage in gallons</u>
1	80	600	416	833	85
1-2	160	1,200	832	1,666	170
1-3	240	1,800	1,248	2,499	255
1-4	320	2,400	1,664	3,332	340
1-5	400	3,000	2,080	4,165	425
1-6	480	3,600	2,496	4,998	510
1-7	560	4,200	2,912	5,831	595
1-8	640	4,800	3,328	6,664	680
1-9	720	5,400	3,744	7,497	765
1-10	800	6,000	4,160	8,330	850
1-11	880	6,600	4,576	9,163	935
1-12	960	7,200	5,000	10,000	1,031

After the first 12 calendar months of operation following the issuance of this permit, compliance

with the annual usage limits shall be based upon a rolling, 12-month summation of the usage figures.

3. The use of photochemically reactive material as defined in OAC rule 3745-21-01(C)(5) is prohibited.

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

1. The permittee shall collect and record the following information each month:
  - a. The company identification of each liquid organic material employed in this emissions unit; and,
  - b. A record of each liquid organic material employed in this emissions unit indicating, whether or not the liquid organic material is photochemically reactive as identified in OAC rule 3745-21-01(C)(5).
2. The permittee shall collect and record the following information each month for the entire facility:
  - a. The name and identification number of each coating 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/thinner employed;
  - f. The individual HAP content for each HAP of each cleanup material/thinner, in pounds of individual HAP per gallon of cleanup material, as applied;
  - g. The total combined HAP content of each cleanup material/thinner, in pounds of combined HAPs per gallon of cleanup material/thinner, as applied [sum all the individual HAP contents from (f)];
  - h. The number of gallons of each cleanup material employed;
  - i. The total individual HAP usage for each HAP from all coatings and cleanup materials/thinner 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/thinner];
  - j. The total combined HAP usage from all coatings and cleanup materials/thinner employed,

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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/thinner];

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- k. The updated rolling, 12-month summation of usage for each individual HAP\*\*, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months. For the first twelve months following the issuance of the permit, this shall be a cumulative total for all months since the issuance of the PTI; and,
  - l. The updated rolling, 12-month summation of usage for total combined HAP\*\*, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months. For the first twelve months following the issuance of the permit, this shall be a cumulative total for all months since the issuance of the PTI.
- \* 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 HAP(s) emitted are the same as the amounts of HAP(s) used since all HAP(s) used evaporated.
3. The permittee shall collect and record the following information each day for emissions units R001-R006:
    - a. The company identification for each coating (enamel, varnish, glaze and toner) and cleanup material employed;
    - b. The OC content of each coating and cleanup material/thinner, in pounds per gallon, as applied;
    - c. The number of gallons of each coating and cleanup material employed;
    - d. The total combined OC emissions from all coatings and cleanup materials/thinner employed, in pounds per day [the sum of (b) times (c) for each coating and cleanup material/thinner];
  4. The permittee shall collect and record the following information each month for emissions units R001-R006:
    - a. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the usage figures for each coating (enamel, varnish, glaze and toner) and cleanup material employed, in gallons. Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall

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record the cumulative coating and cleanup material usage figures for each calendar month;  
and,

- b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the total combined OC emissions from all coatings and cleanup materials employed, in pounds or tons. Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative total combined OC emissions for each calendar month.
5. The permit to install for this emissions unit R006 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: Isobutanol and Butanol

TLV ( $\mu\text{g}/\text{m}^3$ ): 151,600

Maximum Hourly Emission Rate (lbs/hr): 183.58

Predicted 1-Hour Maximum Ground-Level Concentration ( $\mu\text{g}/\text{m}^3$ ): 3388

MAGLC ( $\mu\text{g}/\text{m}^3$ ): 3609

Pollutant: Toluene

TLV ( $\mu\text{g}/\text{m}^3$ ): 188,000

Maximum Hourly Emission Rate (lbs/hr): 183.58

Predicted 1-Hour Maximum Ground-Level Concentration ( $\mu\text{g}/\text{m}^3$ ): 3388

MAGLC ( $\mu\text{g}/\text{m}^3$ ): 4476

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

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permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

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

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.

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

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

**D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which identify each day during which any photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] was employed in

Emissions Unit ID: **R006**

this emissions unit. This report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of all OC emissions for each such day.

2. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the actual usage of HAP limitations set forth in term A.2.b. The permittee shall submit annual reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year. If no exceedances occurred during the reporting period then a report is required stating so.

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3. The permittee shall submit quarterly reports which specify the rolling, 12-month summation for coating (enamel, varnish, glaze and toner) and cleanup material usage figures for each month and the rolling, 12-month summation for total combined OC emissions from all coatings and cleanup materials employed for each month.
4. The permittee shall submit deviation (excursion) reports which identify each day during which the organic compound emissions from the coatings (enamel, varnish, glaze and toner) and cleanup material exceeded the limits set forth in Section A.1. of this permit, and the actual organic compound emission rate for each such day.
5. The permittee shall submit deviation (excursion) reports which identify each day during which the coating (enamel, varnish, glaze and toner) and cleanup usage rates exceeded the limits specified in Section B.1. of this permit, and the actual coating and cleanup usage rates for each such day.
6. The permittee shall submit deviation (excursion) reports which identify any daily record showing the use of any coating (enamel, varnish, glaze or toner) or cleanup material which does not comply with the limits in Section A.2.a. of this permit, and the actual OC content for each such coating or cleanup material.
7. The permittee shall also submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
8. The deviation and quarterly reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

**E. Testing Requirements**

1. Emission Limitation:  
OC content of 4.8 lbs/gallon for enamels employed;  
OC content of 4.9 lbs/gallon for varnishes employed;  
OC content of 6.3 lbs/gallon for glazes employed;  
OC content of 7.3 lbs/gallon for toners employed; and  
OC content of 6.7 lbs/gallon for cleanup materials employed.

Applicable Compliance Method:

Formulation data or USEPA method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the OC contents of the coatings.

2. Emission Limitation:

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1436 lbs/day OC, from all coatings

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section C.3.

3. Emission Limitation:  
67.0 lbs/day OC, from cleanup materials

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section C.3.

4. Emission Limitation:  
75.65 TPY OC, including cleanup

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section C.3., and shall be the sum of the total daily OC emissions for the calendar year.

5. Emission Limitation:  
75.65 TPY OC, including cleanup, for R001-R006 combined, based upon a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Sections C.3. and C.4.

6. Emission Limitation:  
Actual usage of HAP limitations 9.9 TPY or less for any single HAP and 24.9 TPY or less for any combination of HAPs, as denoted in term A.2.b.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section C.2.

7. Usage Limitations for coatings and cleanup materials/thinner for emissions units R001-R006 combined:

Less than 960 gallons enamel per year;  
Less than 7,200 gallons varnish per year;  
Less than 5,000 gallons glaze per year;  
Less than 10,000 gallons toner per year; and

**The Avon Workshop, Inc.**  
**PTI**  
**Issue**

**Facility ID: 1431053946**

**Emissions Unit ID: R006**

Less than 1,031 gallons cleanup materials per year.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Sections C.3. and C.4.

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PTI /

Emissions Unit ID: **R006**

**Issued: To be entered upon final issuance**

8. Usage Limitations for coatings and cleanup materials for emissions unit R006:

Less than 10 gallons enamel per day;  
Less than 70 gallons of varnish per day;  
Less than 50 gallons of glaze per day;  
Less than 100 gallons of toner per day; and  
Less than 10 gallons of cleanup material per day.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section C.3.

**F. Miscellaneous Requirements**

1. The preceding terms and conditions in Sections A. through F. shall supersede all the air pollution control requirements for emissions unit R001 contained in permit to install number 14-4297 as issued on June 11, 1997.
2. The following terms and conditions of this permit are federally enforceable, pursuant to OAC rule 3745-31-05(D): A.2.a., A.2.b., B.1. - B.3., C.1. - C.4., D.1.- D.6., and E.1 - E.8.

**NEW SOURCE REVIEW FORM B**

PTI Number: 14-04811 Facility ID: 1431053946

FACILITY NAME The Avon Workshop, Inc.

FACILITY DESCRIPTION Paint Sprav Booths with Filters CITY/TWP Blue Ash

Emissions Unit ID: R006

SIC CODE 2519 SCC CODE 4-02-025-99 EMISSIONS UNIT ID R001

EMISSIONS UNIT DESCRIPTION Paint Spray Booth with dry filter (Modification)

DATE INSTALLED 4/97

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	Attainment				
PM <sub>10</sub>	Attainment				
Sulfur Dioxide	Attainment				
Organic Compounds	Non-Attainment	1148.8 lbs/day (coatings) 53.6 lbs/day (cleanup)	55.22 for R001-R006 combined	1436.0 lbs/day (coatings) 67.0 lbs/day (cleanup)	75.65 for R001-R006 combined
Nitrogen Oxides	Attainment				
Carbon Monoxide	Attainment				
Lead	Attainment				
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

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

BAT is in compliance with applicable rules, OC content limitations, 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: Butanol, Isobutanol, Toluene

**NEW SOURCE REVIEW FORM B**

PTI Number: 14-04811

Facility ID: 1431053946

FACILITY NAME The Avon Workshop, Inc.

FACILITY DESCRIPTION Paint Sprav Booths with Filters

CITY/TWP Blue Ash

Emissions Unit ID: **R006**

SIC CODE 2519

SCC CODE 4-02-025-99

EMISSIONS UNIT ID R002

EMISSIONS UNIT DESCRIPTION Paint Spray Booth with dry filter(Modification)

DATE INSTALLED Not Begun

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	Attainment				
PM <sub>10</sub>	Attainment				
Sulfur Dioxide	Attainment				
Organic Compounds	Non-Attainment	1148.8 lbs/day (coatings) 53.6 lbs/day (cleanup)	55.22 for R001-R006 combined	1436.0 lbs/day (coatings) 67.0 lbs/day (cleanup)	75.65 for R001-R006 combined
Nitrogen Oxides	Attainment				
Carbon Monoxide	Attainment				
Lead	Attainment				
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS?

NESHAP?

PSD?

OFFSET POLICY?

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

BAT is in compliance with applicable rules, OC content limitations, 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:

Butanol, Isobutanol, Toluene

**NEW SOURCE REVIEW FORM B**

PTI Number: 14-04811

Facility ID: 1431053946

FACILITY NAME The Avon Workshop, Inc.

FACILITY DESCRIPTION Paint Sprav Booths with Filters

CITY/TWP Blue Ash

Emissions Unit ID: **R006**

SIC CODE 2519

SCC CODE 4-02-025-99

EMISSIONS UNIT ID R003

EMISSIONS UNIT DESCRIPTION Paint Spray Booth with dry filter (Modification)

DATE INSTALLED 4/97

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	Attainment				
PM <sub>10</sub>	Attainment				
Sulfur Dioxide	Attainment				
Organic Compounds	Non-Attainment	1148.8 lbs/day (coatings) 53.6 lbs/day (cleanup)	55.22 for R001-R006 combined	1436.0 lbs/day (coatings) 67.0 lbs/day (cleanup)	75.65 for R001-R006 combined
Nitrogen Oxides	Attainment				
Carbon Monoxide	Attainment				
Lead	Attainment				
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS?

NESHAP?

PSD?

OFFSET POLICY?

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

BAT is in compliance with applicable rules, OC content limitations, 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:

Butanol, Isobutanol, Toluene

**NEW SOURCE REVIEW FORM B**

PTI Number: 14-04811

Facility ID: 1431053946

FACILITY NAME The Avon Workshop, Inc.

FACILITY DESCRIPTION Paint Sprav Booths with Filters

CITY/TWP Blue Ash

Emissions Unit ID: **R006**

SIC CODE 2519

SCC CODE 4-02-025-99

EMISSIONS UNIT ID R004

EMISSIONS UNIT DESCRIPTION Paint Spray Booth with dry filter (Modification)

DATE INSTALLED Not Begun

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	Attainment				
PM <sub>10</sub>	Attainment				
Sulfur Dioxide	Attainment				
Organic Compounds	Non-Attainment	1148.8 lbs/day (coatings) 53.6 lbs/day (cleanup)	55.22 for R001-R006 combined	1436.0 lbs/day (coatings) 67.0 lbs/day (cleanup)	75.65 for R001-R006 combined
Nitrogen Oxides	Attainment				
Carbon Monoxide	Attainment				
Lead	Attainment				
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS?

NESHAP?

PSD?

OFFSET POLICY?

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

BAT is in compliance with applicable rules, OC content limitations, 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:

Butanol, Isobutanol, Toluene

**NEW SC**

PTI Num

FACILITY

Emissions Unit ID: **R006**

FACILITY DESCRIPTION Paint Spray Booths with Filters CITY/TWP Blue Ash

SIC CODE 2519 SCC CODE 4-02-025-99 EMISSIONS UNIT ID R005

EMISSIONS UNIT DESCRIPTION Paint Spray Booth with dry filter (Modification)

DATE INSTALLED 4/97

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	Attainment				
PM <sub>10</sub>	Attainment				
Sulfur Dioxide	Attainment				
Organic Compounds	Non-Attainment	1148.8 lbs/day (coatings) 53.6 lbs/day (cleanup)	55.22 for R001-R006 combined	1436.0 lbs/day (coatings) 67.0 lbs/day (cleanup)	75.65 for R001-R006 combined
Nitrogen Oxides	Attainment				
Carbon Monoxide	Attainment				
Lead	Attainment				
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? \_\_\_\_\_ NESHAP? \_\_\_\_\_ PSD? \_\_\_\_\_ OFFSET POLICY? \_\_\_\_\_

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**TOXIC AIR CONTAMINANTS**

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AIR TOXICS MODELING PERFORMED\*? X YES        NO

IDENTIFY THE AIR CONTAMINANTS: Butanol, Isobutanol, Toluene

