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

Permit To Install **14-03855**

A. Source Description

Merrell Pharmaceuticals, Inc., manufactures pharmaceuticals and is presently a non-Title V facility and non-attainment (Emissions Offset Policy) . This permit application is for four existing granulation drying ovens for the dry products manufacturing area of the facility. These ovens are used to tray dry wet granulation material during the manufacturing process for pharmaceutical tablet dosage forms.

B. Facility Emissions and Attainment Status

Merrell Pharmaceuticals, Inc. is a major stationary source based on potential HAP emissions for purposes of Title V applicability, and major stationary source for purposes of Emissions Offset Policy.. The facility is located in Hamilton County which is designated a non-attainment area for Ozone and attainment for all other pollutants.

C. Source Emissions

Potential particulate emissions and organic emissions were calculated based upon facility supplied maximum emissions and annual production data. Potential particulate emissions are 1.92 TPY. Potential organic emissions are 43.8 TPY times four emissions units results in 175.2 TPY per emission unit. The potential HAP emissions from these emissions unit are greater than 9.9 TPY of any individual HAP and 24.9 TPY of combined HAPs. The proposed additional terms and conditions will limit the HAP emissions to less than 9.9 TPY of any individual HAP and 24.9 TPY of combined HAPs and the organic emissions to 3.6 TPY . The permittee will maintain monthly records to demonstrate compliance with the limits.

D. Conclusion

With this modification, the federally enforceable terms and conditions in this permit to install will limit the HAP emissions to less than 10 TPY for any single HAP and less than 25 TPY for combined HAPs. The permit will also limit the amount of organic solvent used to keep the emissions below major source threshold levels. Because the allowable OC emissions are less than the 100 TPY, major stationary source trigger emissions level, the permittee will not be subject to the requirements of the Emissions Offset Policy. Also the HAP emissions will be limited to 9.9 TPY for any individual HAP and 24.9 TPY for combined HAPs, thus the facility will be exempt from the MACT requirements.

State of Ohio Environmental Protection Agency

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

Mailing Address: Lazarus Gov. Center

RE: DRAFT PERMIT TO INSTALL **CERTIFIED MAIL**
HAMILTON COUNTY
Application No: 14-03855
DATE: 9/13/2002

Merrell Pharmaceuticals Inc.
Teresa Turnbow
2110 Galbraith Road
Cincinnati, OH 45215-6300

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

A Permit to Install may be issued in proposed of final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **$400** 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,

Michael W. Ahern

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

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

DRAFT PERMIT TO INSTALL 14-03855

Application Number:	14-03855
APS Premise Number:	1431380503
Permit Fee:	**To be entered upon final issuance**
Name of Facility:	Merrell Pharmaceuticals Inc.
Person to Contact:	Teresa Turnbow
Address:	2110 Galbraith Road Cincinnati, OH 452156300

Location of proposed air contaminant source(s) [emissions unit(s)]:
2110 East Galbraith Road
Cincinnati, **Ohio**

Description of proposed emissions unit(s):
Administrative modification to add the HAPs term to the terms.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

_____
Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

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

3. Records Retention Requirements

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

4. Inspections and Information Requests

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

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

5. Scheduled Maintenance/Malfunction Reporting

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

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

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

9. Construction of New Sources(s)

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

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

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

10. Public Disclosure

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

11. Applicability

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

12. Best Available Technology

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

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

a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete

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

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

14. Construction Compliance Certification

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

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

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

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

Pollutant	Tons Per Year
OC	3.6
PM/PM10	1.92

Emissions Unit ID: **P044**

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

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements
P044 - Granulation Drying Oven, TG-81	OAC rule 3745-31-05(A)(3)
(administrative modification to accept emissions and usage limitations to avoid federal Title V, MACT and non-attainment review (Emissions Offset Policy) requirements)	OAC rule 3745-17-07(A)(1)
	OAC rule 3745-17-11(B)
	OAC rule 3745-21-07(G)(2)
	OAC rule 3745-31-05(D)

Applicable Emissions Limitations/Control Measures	
0.11 lb/hr and 0.48 TPY PM/PM10 64 lbs OC/hr; and 160 lbs OC/day* when employing nonphotochemically reactive materials.	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
*this emissions unit is a batch operation and the daily emissions are based on the worst case batch employed in this emission unit.	The emission limitation specified by this rule is equivalent to the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
The hourly and annual emissions limitations for PM/PM10 and the hourly and daily emissions limitations when employing nonphotochemically reactive materials are based upon the emissions unit's potential to emit. Therefore, no records are required to demonstrate compliance with these limits.	See term A.2.b; See term B.1;
8 lbs OC /hour, 40 lbs OC/day when employing photochemically reactive materials.	0.9 TPY OC*, based on a rolling, 12-month summation. *for purposes of determining the applicability of whether or not this permitting action would be considered a major stationary source subject to Emissions Offset Policy, all VOC emissions are considered to be OC.
The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1), and OAC rule 3745-31-05(D).	
Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.	

2. Additional Terms and Conditions

2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by emission limitations, organic solvent usage limitations and use of a HEPA filter with a control efficiency of at least 99 percent for particulate emissions and compliance with the air toxics policy.

2.b The allowable emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from all emissions units at 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 upon a rolling, 12-month summation. The permittee has existing records to demonstrate compliance with the rolling, 12-month summation limitation.

B. Operational Restrictions

1. The maximum annual organic solvent usage rate** for this emissions unit shall not exceed 1800 pounds per year, based upon a rolling, 12-month summation of the usage rates.

   The permittee has existing records to demonstrate compliance with this term upon issuance of this permit.

   ** this is based upon the premise that 100% of the solvent contained in the process material employed is emitted as OC emissions.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of following information:

   a. The organic solvent usage rate** for each month, in pounds.

   b. The rolling, 12-month summation of the organic solvent usage rate**, in pounds.

   c. The organic compound emissions in pounds.

   ** this is based upon the premise that 100% of the solvent contained in the process material employed is emitted as OC emissions.

2. On any day that any photochemically reactive material [as identified in OAC rule 3745-21-01(C)(5)] is employed, the permittee shall collect and record the following information:

   a. The company identification of each organic solvent material employed.

   b. The total amount of organic solvent material employed, in pounds.

   c. The total organic compound emissions from all organic solvents employed, in pounds

   d. The total number of hours of operation.

   e. The average hourly organic compound emission rate for all organic solvents employed, (c/d), in pounds per hour (average).

3. The permittee shall collect and record the following information each month for the entire facility:

a. The name and identification of each HAP employed.

b. The amount of each HAP employed, in pounds.

c. The total individual HAP emissions from each individual HAP employed, in pounds or tons per month.

d. The total combined HAP emissions from all HAPs employed, in pounds or tons per month.

e. The updated rolling, 12-month summation of emissions for each individual HAP*, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and

f. The updated rolling, 12-month summation of emissions for the total combined HAP*, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

* A listing of 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 ne kept on an emission unit - by- emission unit basis.

4. The permit to install for this emissions unit P044 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model(or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: isopropyl alcohol

TLV (ug/m3): 983,000

Maximum Hourly Emission Rate (lbs/hr): 256 (P044, P045, P046, P047)

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 14,960

MAGLC (ug/m3): 23,404

Physical changes to or in the method of operation of the emissions unit after it's installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV) than the pollutant modeled and emissions exceeding 1 TPY, as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s)to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.
The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

a. a description of the parameters changed(composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of it's evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit semi-annual reports indicating the pounds of organic solvent** employed per month and the updated rolling, 12- month summation of the organic solvent** usage rate for each month. These reports shall be submitted by January 31 and July 31 of each year and cover the previous six calendar months (July through December and January through June, respectively).

   ** this is based upon the premise that 100% of the solvent contained in the process material employed is emitted as OC emissions.

2. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP usage limitations set forth in term A.2.b. The permittee shall submit semi-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 and July 31 of each year and cover the previous six calendar months (July through December and January through June, respectively). If no exceedances occurred during the reporting period then a report is required stating so.

3. The permittee shall submit deviation (excursion) reports which identify each day during which a photochemically reactive material was employed, and the OC emission rate exceeded 8 pounds per hour and/or 40 pounds per day. If no exceedances occurred during the reporting period then a report is required stating so.

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

E. Testing Requirements

1. For the purpose of determining compliance with OAC rule 3745-17-07(A), visible particulate emissions shall be determined according to Method 9 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60, "Standards of Performance for New Stationary Sources" as such appendix existed on July 1, 1996.

2. Compliance with the emission limitations in term A.1 shall be determined in accordance with the following methods:

   a. Emission Limitations:

64 lbs OC/hr, 160 lbs OC/day when employing nonphotochemically reactive materials

Applicable Compliance Method:

Compliance with the emission limitations listed above shall be demonstrated by the emission factors, control efficiencies (if applicable) and the operational parameters as submitted in PTI 14-03855 submitted May 3, 1995.

b. Emission Limitations:

8 lbs OC /hour, 40 lbs OC/day when employing photochemically reactive materials

Applicable Compliance Method:

Compliance shall be demonstrated by the recordkeeping in term C.2.

3. Compliance with the organic solvent usage limitation in term B.1 shall be demonstrated by the recordkeeping requirements outlined in term C.1.

4. Compliance with the HAP emissions limits cited in term A.2.b shall be demonstrated by the record keeping in term C.3.

F. Miscellaneous Requirements

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

Emissions Unit ID: **P045**

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

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements
P045 - Granulation Drying Oven, TG-82 (administrative modification to accept emissions and usage limitations to avoid federal Title V, MACT and non-attainment review (Emissions Offset Policy) requirements)	OAC rule 3745-31-05(A)(3)
	OAC rule 3745-17-07(A)(1)
	OAC rule 3745-17-11(B)
	OAC rule 3745-21-07(G)(2)
	OAC rule 3745-31-05(D)

Applicable Emissions Limitations/Control Measures	
0.11 lb/hr and 0.48 TPY PM/PM10 64 lbs OC/hr; and 160 lbs OC/day* when employing nonphotochemically reactive materials.	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
*this emissions unit is a batch operation and the daily emissions are based on the worst case batch employed in this emission unit.	The emission limitation specified by this rule is equivalent to the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
The hourly and annual emissions limitations for PM/PM10 and the hourly and daily emissions limitations when employing nonphotochemically reactive materials are based upon the emissions unit's potential to emit. Therefore, no records are required to demonstrate compliance with these limits.	See term A.2.b; See term B.1;
8 lbs OC /hour, 40 lbs OC/day when employing photochemically reactive materials.	0.9 TPY OC*, based on a rolling, 12-month summation. *for purposes of determining the applicability of whether or not this permitting action would be considered a major stationary source subject to Emissions Offset Policy, all VOC emissions are considered to be OC.
The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1), and OAC rule 3745-31-05(D).	
Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.	

2. Additional Terms and Conditions

2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by emission limitations, organic solvent usage limitations and use of a HEPA filter with a control efficiency of at least 99 percent for particulate emissions and compliance with the air toxics policy.

2.b The allowable emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from all emissions units at 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 upon a rolling, 12-month summation. The permittee has existing records to demonstrate compliance with the rolling, 12-month summation limitation.

B. Operational Restrictions

1. The maximum annual organic solvent usage rate** for this emissions unit shall not exceed 1800 pounds per year, based upon a rolling, 12-month summation of the usage rates.

   The permittee has existing records to demonstrate compliance with this term upon issuance of this permit.

   ** this is based upon the premise that 100% of the solvent contained in the process material employed is emitted as OC emissions.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of following information:

   a. The organic solvent usage rate** for each month, in pounds.

   b. The rolling, 12-month summation of the organic solvent usage rate**, in pounds.

   c. The organic compound emissions in pounds.

   ** this is based upon the premise that 100% of the solvent contained in the process material employed is emitted as OC emissions.

2. On any day that any photochemically reactive material [as identified in OAC rule 3745-21-01(C)(5)] is employed, the permittee shall collect and record the following information:

   a. The company identification of each organic solvent material employed.

   b. The total amount of organic solvent material employed, in pounds.

   c. The total organic compound emissions from all organic solvents employed, in pounds

   d. The total number of hours of operation.

   e. The average hourly organic compound emission rate for all organic solvents employed, (c/d), in pounds per hour (average).

3. The permittee shall collect and record the following information each month for the entire facility:

a. The name and identification of each HAP employed.

b. The amount of each HAP employed, in pounds.

c. The total individual HAP emissions from each individual HAP employed, in pounds or tons per month.

d. The total combined HAP emissions from all HAPs employed, in pounds or tons per month.

e. The updated rolling, 12-month summation of emissions for each individual HAP*, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and

f. The updated rolling, 12-month summation of emissions for the total combined HAP*, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

* A listing of 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 ne kept on an emission unit - by- emission unit basis.

4. The permit to install for this emissions unit P045 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model(or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: isopropyl alcohol

TLV (ug/m3): 983,000

Maximum Hourly Emission Rate (lbs/hr): 256 (P044, P045, P046, P047)

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 14,960

MAGLC (ug/m3): 23,404

Physical changes to or in the method of operation of the emissions unit after it's installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV) than the pollutant modeled and emissions exceeding 1 TPY, as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s)to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.
The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

a. a description of the parameters changed(composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of it's evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit semi-annual reports indicating the pounds of organic solvent** employed per month and the updated rolling, 12- month summation of the organic solvent **usage rate for each month. These reports shall be submitted by January 31 and July 31 of each year and cover the previous six calendar months (July through December and January through June, respectively).

   ** this is based upon the premise that 100% of the solvent contained in the process material employed is emitted as OC emissions.

2. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP usage limitations set forth in term A.2.b. The permittee shall submit semi-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 and July 31 of each year and cover the previous six calendar months (July through December and January through June, respectively). If no exceedances occurred during the reporting period then a report is required stating so.

3. The permittee shall submit deviation (excursion) reports which identify each day during which a photochemically reactive material was employed, and the OC emission rate exceeded 8 pounds per hour and/or 40 pounds per day. If no exceedances occurred during the reporting period then a report is required stating so.

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

E. Testing Requirements

1. For the purpose of determining compliance with OAC rule 3745-17-07(A), visible particulate emissions shall be determined according to Method 9 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60, "Standards of Performance for New Stationary Sources" as such appendix existed on July 1, 1996.

2. Compliance with the emission limitations in term A.1 shall be determined in accordance with the following methods:

   a. Emission Limitations:

64 lbs OC/hr, 160 lbs OC/day when employing nonphotochemically reactive materials

Applicable Compliance Method:

Compliance with the emission limitations listed above shall be demonstrated by the emission factors, control efficiencies (if applicable) and the operational parameters as submitted in PTI 14-03855 submitted May 3, 1995.

b. Emission Limitations:

8 lbs OC /hour, 40 lbs OC/day when employing photochemically reactive materials

Applicable Compliance Method:

Compliance shall be demonstrated by the recordkeeping in term C.2.

3. Compliance with the organic solvent usage limitation in term B.1 shall be demonstrated by the recordkeeping requirements outlined in term C.1.

4. Compliance with the HAP emissions limits cited in term A.2.b shall be demonstrated by the record keeping in term C.3.

F. Miscellaneous Requirements

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

Emissions Unit ID: **P046**

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

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements
P046 - Granulation Drying Oven, TG-83 (administrative modification to accept emissions and usage limitations to avoid federal Title V, MACT and non-attainment review (Emissions Offset Policy) requirements)	OAC rule 3745-31-05(A)(3)
	OAC rule 3745-17-07(A)(1)
	OAC rule 3745-17-11(B)
	OAC rule 3745-21-07(G)(2)
	OAC rule 3745-31-05(D)

Applicable Emissions Limitations/Control Measures	
0.11 lb/hr and 0.48 TPY PM/PM10 64 lbs OC/hr; and 160 lbs OC/day* when employing nonphotochemically reactive materials.	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
*this emissions unit is a batch operation and the daily emissions are based on the worst case batch employed in this emission unit.	The emission limitation specified by this rule is equivalent to the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
The hourly and annual emissions limitations for PM/PM10 and the hourly and daily emissions limitations when employing nonphotochemically reactive materials are based upon the emissions unit's potential to emit. Therefore, no records are required to demonstrate compliance with these limits.	See term A.2.b; See term B.1;
8 lbs OC /hour, 40 lbs OC/day when employing photochemically reactive materials.	0.9 TPY OC*, based on a rolling, 12-month summation. *for purposes of determining the applicability of whether or not this permitting action would be considered a major stationary source subject to Emissions Offset Policy, all VOC emissions are considered to be OC.
The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1), and OAC rule 3745-31-05(D).	
Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.	

2. Additional Terms and Conditions

2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by emission limitations, organic solvent usage limitations and use of a HEPA filter with a control efficiency of at least 99 percent for particulate emissions and compliance with the air toxics policy.

2.b The allowable emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from all emissions units at 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 upon a rolling, 12-month summation. The permittee has existing records to demonstrate compliance with the rolling, 12-month summation limitation.

B. Operational Restrictions

1. The maximum annual organic solvent usage rate** for this emissions unit shall not exceed 1800 pounds per year, based upon a rolling, 12-month summation of the usage rates.

   The permittee has existing records to demonstrate compliance with this term upon issuance of this permit.

   ** this is based upon the premise that 100% of the solvent contained in the process material employed is emitted as OC emissions.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of following information:

   a. The organic solvent usage rate** for each month, in pounds.

   b. The rolling, 12-month summation of the organic solvent usage rate**, in pounds.

   c. The organic compound emissions in pounds.

   ** this is based upon the premise that 100% of the solvent contained in the process material employed is emitted as OC emissions.

2. On any day that any photochemically reactive material [as identified in OAC rule 3745-21-01(C)(5)] is employed, the permittee shall collect and record the following information:

   a. The company identification of each organic solvent material employed.

   b. The total amount of organic solvent material employed, in pounds.

   c. The total organic compound emissions from all organic solvents employed, in pounds

   d. The total number of hours of operation.

   e. The average hourly organic compound emission rate for all organic solvents employed, (c/d), in pounds per hour (average).

3. The permittee shall collect and record the following information each month for the entire facility:

a. The name and identification of each HAP employed.

b. The amount of each HAP employed, in pounds.

c. The total individual HAP emissions from each individual HAP employed, in pounds or tons per month.

d. The total combined HAP emissions from all HAPs employed, in pounds or tons per month.

e. The updated rolling, 12-month summation of emissions for each individual HAP*, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and

f. The updated rolling, 12-month summation of emissions for the total combined HAP*, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

* A listing of 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 ne kept on an emission unit - by- emission unit basis.

4. The permit to install for this emissions unit P046 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model(or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: isopropyl alcohol

TLV (ug/m3): 983,000

Maximum Hourly Emission Rate (lbs/hr): 256 (P044, P045, P046, P047)

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 14,960

MAGLC (ug/m3): 23,404

Physical changes to or in the method of operation of the emissions unit after it's installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV) than the pollutant modeled and emissions exceeding 1 TPY, as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s)to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.
The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

a. a description of the parameters changed(composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of it's evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit semi-annual reports indicating the pounds of organic solvent** employed per month and the updated rolling, 12- month summation of the organic solvent** usage rate for each month. These reports shall be submitted by January 31 and July 31 of each year and cover the previous six calendar months (July through December and January through June, respectively).

   ** this is based upon the premise that 100% of the solvent contained in the process material employed is emitted as OC emissions.

2. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP usage limitations set forth in term A.2.b. The permittee shall submit semi-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 and July 31 of each year and cover the previous six calendar months (July through December and January through June, respectively). If no exceedances occurred during the reporting period then a report is required stating so.

3. The permittee shall submit deviation (excursion) reports which identify each day during which a photochemically reactive material was employed, and the OC emission rate exceeded 8 pounds per hour and/or 40 pounds per day. If no exceedances occurred during the reporting period then a report is required stating so.

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

E. Testing Requirements

1. For the purpose of determining compliance with OAC rule 3745-17-07(A), visible particulate emissions shall be determined according to Method 9 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60, "Standards of Performance for New Stationary Sources" as such appendix existed on July 1, 1996.

2. Compliance with the emission limitations in term A.1 shall be determined in accordance with the following methods:

   a. Emission Limitations:

64 lbs OC/hr, 160 lbs OC/day when employing nonphotochemically reactive materials

Applicable Compliance Method:

Compliance with the emission limitations listed above shall be demonstrated by the emission factors, control efficiencies (if applicable) and the operational parameters as submitted in PTI 14-03855 submitted May 3, 1995.

b. Emission Limitations:

8 lbs OC /hour, 40 lbs OC/day when employing photochemically reactive materials

Applicable Compliance Method:

Compliance shall be demonstrated by the recordkeeping in term C.2.

3. Compliance with the organic solvent usage limitation in term B.1 shall be demonstrated by the recordkeeping requirements outlined in term C.1.

4. Compliance with the HAP emissions limits cited in term A.2.b shall be demonstrated by the record keeping in term C.3.

F. Miscellaneous Requirements

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

Emissions Unit ID: **P047**

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

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements
P047 - Granulation Drying Oven, TG-84 (administrative modification to accept emissions and usage limitations to avoid federal Title V, MACT and non-attainment review (Emissions Offset Policy) requirements)	OAC rule 3745-31-05(A)(3)
	OAC rule 3745-17-07(A)(1)
	OAC rule 3745-17-11(B)
	OAC rule 3745-21-07(G)(2)
	OAC rule 3745-31-05(D)

Applicable Emissions Limitations/Control Measures	
0.11 lb/hr and 0.48 TPY PM/PM10 64 lbs OC/hr; and 160 lbs OC/day* when employing nonphotochemically reactive materials.	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
*this emissions unit is a batch operation and the daily emissions are based on the worst case batch employed in this emission unit.	The emission limitation specified by this rule is equivalent to the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
The hourly and annual emissions limitations for PM/PM10 and the hourly and daily emissions limitations when employing nonphotochemically reactive materials are based upon the emissions unit's potential to emit. Therefore, no records are required to demonstrate compliance with these limits.	See term A.2.b; See term B.1;
8 lbs OC /hour, 40 lbs OC/day when employing photochemically reactive materials.	0.9 TPY OC*, based on a rolling, 12-month summation. *for purposes of determining the applicability of whether or not this permitting action would be considered a major stationary source subject to Emissions Offset Policy, all VOC emissions are considered to be OC.
The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1), and OAC rule 3745-31-05(D).	
Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.	

2. Additional Terms and Conditions

2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by emission limitations, organic solvent usage limitations and use of a HEPA filter with a control efficiency of at least 99 percent for particulate emissions and compliance with the air toxics policy.

2.b The allowable emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from all emissions units at 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 upon a rolling, 12-month summation. The permittee has existing records to demonstrate compliance with the rolling, 12-month summation limitation.

B. Operational Restrictions

1. The maximum annual organic solvent usage rate** for this emissions unit shall not exceed 1800 pounds per year, based upon a rolling, 12-month summation of the usage rates.

   The permittee has existing records to demonstrate compliance with this term upon issuance of this permit.

   ** this is based upon the premise that 100% of the solvent contained in the process material employed is emitted as OC emissions.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of following information:

   a. The organic solvent usage rate** for each month, in pounds.

   b. The rolling, 12-month summation of the organic solvent usage rate**, in pounds.

   c. The organic compound emissions in pounds.

   ** this is based upon the premise that 100% of the solvent contained in the process material employed is emitted as OC emissions.

2. On any day that any photochemically reactive material [as identified in OAC rule 3745-21-01(C)(5)] is employed, the permittee shall collect and record the following information:

   a. The company identification of each organic solvent material employed.

   b. The total amount of organic solvent material employed, in pounds.

   c. The total organic compound emissions from all organic solvents employed, in pounds

   d. The total number of hours of operation.

   e. The average hourly organic compound emission rate for all organic solvents employed, (c/d), in pounds per hour (average).

3. The permittee shall collect and record the following information each month for the entire facility:

a. The name and identification of each HAP employed.

b. The amount of each HAP employed, in pounds.

c. The total individual HAP emissions from each individual HAP employed, in pounds or tons per month.

d. The total combined HAP emissions from all HAPs employed, in pounds or tons per month.

e. The updated rolling, 12-month summation of emissions for each individual HAP*, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and

f. The updated rolling, 12-month summation of emissions for the total combined HAP*, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

* A listing of 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 ne kept on an emission unit - by- emission unit basis.

4. The permit to install for this emissions unit P047 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model(or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: isopropyl alcohol

TLV (ug/m3): 983,000

Maximum Hourly Emission Rate (lbs/hr): 256 (P044, P045, P046, P047)

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 14,960

MAGLC (ug/m3): 23,404

Physical changes to or in the method of operation of the emissions unit after it's installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV) than the pollutant modeled and emissions exceeding 1 TPY, as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s)to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.
The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

a. a description of the parameters changed(composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of it's evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit semi-annual reports indicating the pounds of organic solvent** employed per month and the updated rolling, 12- month summation of the organic solvent** usage rate for each month. These reports shall be submitted by January 31 and July 31 of each year and cover the previous six calendar months (July through December and January through June, respectively).

   ** this is based upon the premise that 100% of the solvent contained in the process material employed is emitted as OC emissions.

2. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP usage limitations set forth in term A.2.b. The permittee shall submit semi-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 and July 31 of each year and cover the previous six calendar months (July through December and January through June, respectively). If no exceedances occurred during the reporting period then a report is required stating so.

3. The permittee shall submit deviation (excursion) reports which identify each day during which a photochemically reactive material was employed, and the OC emission rate exceeded 8 pounds per hour and/or 40 pounds per day. If no exceedances occurred during the reporting period then a report is required stating so.

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

E. Testing Requirements

1. For the purpose of determining compliance with OAC rule 3745-17-07(A), visible particulate emissions shall be determined according to Method 9 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60, "Standards of Performance for New Stationary Sources" as such appendix existed on July 1, 1996.

2. Compliance with the emission limitations in term A.1 shall be determined in accordance with the following methods:

   a. Emission Limitations:

64 lbs OC/hr, 160 lbs OC/day when employing nonphotochemically reactive materials

Applicable Compliance Method:

Compliance with the emission limitations listed above shall be demonstrated by the emission factors, control efficiencies (if applicable) and the operational parameters as submitted in PTI 14-03855 submitted May 3, 1995.

b. Emission Limitations:

8 lbs OC /hour, 40 lbs OC/day when employing photochemically reactive materials

Applicable Compliance Method:

Compliance shall be demonstrated by the recordkeeping in term C.2.

3. Compliance with the organic solvent usage limitation in term B.1 shall be demonstrated by the recordkeeping requirements outlined in term C.1.

4. Compliance with the HAP emissions limits cited in term A.2.b shall be demonstrated by the record keeping in term C.3.

F. Miscellaneous Requirements

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