

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

Permit To Install **14-05553**

A. Source Description

Hunting Industrial Coatings is a paint manufacturing facility located in Cincinnati, Ohio. The facility mixes paints to the customer demand for color and pigment size. Once the paint is mixed to the proper specifications, the material is then pumped into holding tanks before shipment to the customer.

B. Facility Emissions and Attainment Status

The annual allowable VOC emissions for the facility will be 39.9 TPY. The annual allowable particulate emissions for the facility will be 32.9 TPY. The facility will be synthetic minor for VOC and HAPS. The facility is located in Hamilton County which is nonattainment for ozone and nitrogen oxides.

C. Source Emissions

All of the particulate emissions are released during the initial batching process that takes place at the mixers (P001-P005, P007, P011-P017 and P027). Particulate emissions are limited to 32.9 TPY for these sources combined. VOC emissions are also released during the batching process. The batch is then mixed to the proper color specification, pumped into the mills (P021-P024) if the particle size needs to be reduced and then pumped into one of the five storage tanks (P006, P008, P010, P025 and P026). The potential to emit for emissions units P001-P027 is 323 TPY of VOC and 32.9 TPY of PM/PM10.

D. Conclusion

The facility wants to add one mixer and applied for a synthetic minor group permit to ease record keeping burdens and be able to meet customer demands. The facility will keep rolling, 12-month summation production records to demonstrate compliance with the permit limits. The facility will accept a facility wide limit of 39.9 TPY VOC, less than 10 tons per year for each individual HAP and less than 25 tons per year for combined HAPs to avoid the Emissions Offset and Title V requirements.



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 CERTIFIED MAIL
HAMILTON COUNTY**

Application No: 14-05553

DATE: 8/10/2004

Hunting Industrial Coatings
David Sullivan
10448 Chester Road
Cincinnati, OH 45215

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 **\$4200** 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-Kentucky-Indiana Reg Council of Gov

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IN

HAMILTON COUNTY

PUBLIC NOTICE

ISSUANCE OF DRAFT PERMIT TO INSTALL **14-05553** FOR AN AIR CONTAMINANT SOURCE FOR **HUNTING INDUSTRIAL COATINGS**

On 8/10/2004 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Hunting Industrial Coatings**, located at **10448 Chester Road, Cincinnati, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 14-05553:

Chapter 31 modification to PTI 14-03168, 14-04437, 14-04535, 14-04808, and 14-05039 for a facility wide synthetic minor permit.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Brad Miller, Hamilton County Department of Environmental Services, 250 William Howard Taft Pkwy,
Cincinnati, OH 45219-2660 [(513)946-7777]



**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 14-05553

Application Number: 14-05553
APS Premise Number: 1431480257
Permit Fee: **To be entered upon final issuance**
Name of Facility: Hunting Industrial Coatings
Person to Contact: David Sullivan
Address: 10448 Chester Road
Cincinnati, OH 45215

Location of proposed air contaminant source(s) [emissions unit(s)]:

**10448 Chester Road
Cincinnati, Ohio**

Description of proposed emissions unit(s):

Chapter 31 modification to PTI 14-03168, 14-04437, 14-04535, 14-04808, and 14-05039 for a facility wide synthetic minor permit.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

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

3. Records Retention Requirements

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

4. Inspections and Information Requests

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

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

5. Scheduled Maintenance/Malfunction Reporting

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

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

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

9. Construction of New Sources(s)

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

Hunting Industrial Coatings

Facility ID: 1431480257

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Issued: To be entered upon final issuance

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

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

10. Public Disclosure

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

11. Applicability

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

12. Best Available Technology

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

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

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is

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granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

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14. Construction Compliance Certification

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

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	39.9
PM/PM10	32.9
HAP	9.9
HAPs	24.9

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

A. Applicable Emissions Limitations and/or Control Requirements

- 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>
P001 - High Speed Dispersion Mixer 131 (modification)	OAC rule 3745-31-05(A)(3) OAC rule 3745-17-07(A)(1) OAC rule 3745-17-07(B)(1) OAC rule 3745-17-08(B) OAC rule 3745-21-07(G) OAC rule 3745-17-11
	OAC rule 3745-31-05(C)

Hunting Industrial Coatings

PTI A

Issued

Facility ID: 1431480257

Emissions Unit ID: P001

Applicable Emissions
Limitations/Control Measures

Volatile organic compound (VOC) emissions from the mixer shall not exceed 147.3 pounds per day.

Particulate emissions (PE) from the mixer shall not exceed 18.4 pounds per day and 3.35 tons per year (TPY).

PE = PM10

See Section A.2.a.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1), OAC rule 3745-17-07(B)(1), OAC rule 3745-17-08(B) and OAC rule 3745-31-05(C).

Volatile organic compound (VOC) emissions shall not exceed 39.9 TPY for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 combined, based upon a rolling, 12-month summation

See Sections A.2.b and A.2.c.

See Section A.2.d.

See Section A.2.e

The permittee shall minimize or

eliminate visible particulate emissions by the use of a cover and dust collector.

Exempt

The emission limitation specified by this rule is less stringent than the requirements of OAC rule 3745-31-05(A)(3).

Issued: To be entered upon final issuance

2. Additional Terms and Conditions

2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emissions limitations and use of a cover and dust collector.

2.b Paint production shall not result in an exceedance of the following emission limitations and /or control requirements:

The permittee shall emit no more than 39.9 tons of VOC per rolling, 12-month period based upon the monthly solvent input rate to emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 combined.

Monthly solvent input rate = $(A \times B \times C)/2000$ where A = the number of pounds of each paint mixed per month, B = the percent by weight of solvent of each paint mixed, and C = 0.015 (emission factor for amount of VOC emitted in lbs of VOC per lbs of solvent in the paint).

The permittee has existing records to demonstrate compliance upon issuance of the permit.

2.c The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

2.d Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.

2.e Fugitive visible particulate emissions shall not exceed 20 percent opacity, as a three-minute average.

2.f The daily VOC and the daily and annual PE-PM10 emissions limitations outlined are based upon the emissions unit's Potential To Emit (PTE). Therefore, no records are required to demonstrate compliance with these limits.

B. Operational Restrictions

1. None

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PTI A

Emissions Unit ID: **P001**

Issued: To be entered upon final issuance

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027:
 - a. The name and identification of each batch of paint produced.
 - b. The amount of each paint produced, in pounds.
 - c. The percent by weight VOC of each paint mixed.
 - d. The total combined monthly VOC emissions based upon the solvent input rate equation listed in term A.2.b, in tons per month.
 - e. The updated rolling, 12-month summation of VOC emissions based upon the solvent input rate equation listed in term A.2.b (the summation of the current month's emission total and the previous eleven calendar months emission totals).
 - f. The total combined monthly VOC emissions, in tons per month.
 - g. The updated rolling, 12-month summation of VOC emissions (the summation of the current month's emission total and the previous eleven calendar months emission totals).
2. The permittee shall collect and record the following information each month for determining the particulate matter emissions:
 - a. The name and identification of each batch of paint produced.
 - b. The total amount of solids used in the formulation of paints, in pounds.
 - c. The total monthly PM emissions, in tons per month.
3. The permittee shall collect and record the following information each month for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027:
 - a. The name and identification number of each batch of paint produced containing a HAP(s).
 - b. The number of pounds of each batch of paint produced.
 - c. The individual Hazardous Air Pollutant (HAP) content for each HAP per pound of paint

produced in pounds of individual HAP per pound of paint.

- d. The total combined HAP content of each paint in pounds of combined HAPs per pound of paint [sum all the individual HAP contents from (c)].
- e. The total individual HAP emissions for each HAP from all paints employed in pounds or tons per month [for each individual HAP, the summation of (b) x 1.5 percent x (c)].
- f. The total combined HAP emissions from all paints employed in pounds or tons per month [the summation of (b) x 1.5 percent x (d)].
- g. The updated rolling, 12-month summation for individual HAP emissions for each HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
- h. The updated rolling, 12-month summation for total combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.

D. Reporting Requirements

- 1. The permittee shall submit annual reports which specify the total organic compound emissions from emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027. These reports shall be submitted by January 30 of each year and cover the previous calendar year.
- 2. The permittee shall submit annual reports which specify the particulate matter emissions from this emissions units. These reports shall be submitted by January 30 of each year and cover the previous calendar year.
- 3. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the 12-month VOC emissions limitations listed in Sections A.1 and 2.b. If no deviations occurred during the reporting period, the permittee shall state so in the report.
- 4. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month HAPs emissions limitations in Section A.2.c. If no deviations occurred during the reporting

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PTI A

Emissions Unit ID: P001

Issued: To be entered upon final issuance

period, the permittee shall state so in the report.

5. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emission limitations in Sections A.1 and 2 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

147.3 lbs/day of VOC.

Applicable Compliance Method:

The daily VOC emission rate is based on the emission unit's potential to emit. The potential to emit was calculated by: (maximum production rate in pounds per hour) x (the percent by weight VOC) x (emission factor of 1.5%).

- b. Emission Limitation:

18.4 lbs/day of PE-PM10.

Applicable Compliance Method:

The daily PE-PM10 emission rate is based on the emissions unit's potential to emit. The potential to emit was calculated by: (maximum production rate in pounds per hour) x (the percent by weight PM) x (emission factor of 1.0%).

- c. Emission Limitation:

Volatile organic compound (VOC) emissions based upon the solvent input rate equation listed in term A.2.b shall not exceed 39.9 TPY for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 combined, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the annual volatile organic compound emission limitation based upon the

Emissions Unit ID: **P001**

solvent input rate equation listed in term A.2.b shall be based upon the record keeping requirements as specified in Section C.1.

d. Emission Limitation:

Volatile organic compound (VOC) emissions shall not exceed 39.9 TPY for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 combined, based upon a rolling, 12-month summation

Applicable Compliance Method:

Compliance with the annual volatile organic compound emission limitations in term A.1 shall be based upon the record keeping requirements as specified in Section C.1.

e. Emission Limitation:

3.35 TPY of PE-PM10.

Applicable Compliance Limitation:

Compliance with the annual particulate emission limitations in term A.1 shall be based upon the record keeping requirements as specified in Section C.2.

f. Emissions Limitations:

9.9 TPY for any single HAP and 24.9 TPY for combined HAPs.

Applicable Compliance Method:

Compliance with the HAP emission limitations in term A.2.c will be determined by the record keeping requirements specified in Section C.3.

g. Emissions Limitations:

Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule.

Fugitive visible particulate emissions shall not exceed twenty percent (20%) opacity, as a three-minute average.

Applicable Compliance Method

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PTI A

Emissions Unit ID: **P001**

Issued: To be entered upon final issuance

Compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996.

F. Miscellaneous Requirements

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

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PTI A

Emissions Unit ID: P002

Issued: To be entered upon final issuance

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>
P002 - High Speed Dispersion Mixer 104 (modification)	OAC rule 3745-31-05(A)(3)
	OAC rule 3745-17-07(A)(1)
	OAC rule 3745-17-07(B)(1)
	OAC rule 3745-17-08(B)
	OAC rule 3745-21-07(G)
	OAC rule 3745-17-11
	OAC rule 3745-31-05(C)

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PTI A

Emissions Unit ID: P002

Issued: To be entered upon final issuance

Applicable Emissions
Limitations/Control Measures

Volatile organic compound (VOC) emissions from the mixer shall not exceed 71.1 pounds per day.

Particulate emissions (PE) from the mixer shall not exceed 8.8 pounds per day and 1.61 tons per year (TPY).

PE = PM10

See Section A.2.a.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1), OAC rule 3745-17-07(B)(1), OAC rule 3745-17-08(B) and OAC rule 3745-31-05(C).

Volatile organic compound (VOC) emissions shall not exceed 39.9 TPY for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 combined, based upon a rolling, 12-month summation

See Sections A.2.b and A.2.c.

See Section A.2.d.

See Section A.2.e

The permittee shall minimize or eliminate visible particulate emissions by the use of a cover and dust collector.

Exempt

The emission limitation specified by this rule is less stringent than the requirements of OAC rule 3745-31-05(A)(3).

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PTI A

Emissions Unit ID: **P002**

Issued: To be entered upon final issuance

2. Additional Terms and Conditions

2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emissions limitations and use of a cover and dust collector.

2.b Paint production shall not result in an exceedance of the following emission limitations and /or control requirements:

The permittee shall emit no more than 39.9 tons of VOC per rolling, 12-month period based upon the monthly solvent input rate to emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 combined.

Monthly solvent input rate = $(A \times B \times C)/2000$ where A = the number of pounds of each paint mixed per month, B = the percent by weight solvent of each paint mixed, and C = 0.015 (emission factor for amount of VOC emitted in lbs of VOC per lb of solvent in the paint).

The permittee has existing records to demonstrate compliance upon issuance of the permit.

2.c The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

2.d Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.

2.e Fugitive visible particulate emissions shall not exceed 20 percent opacity, as a three-minute average.

- 2.f** The daily VOC and the daily and annual PE-PM10 emissions limitations outlined are based upon the emissions unit's Potential To Emit (PTE). Therefore, no records are required to demonstrate compliance with these limits.

B. Operational Restrictions

1. None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027:
 - a. The name and identification of each batch of paint produced.
 - b. The amount of each paint produced, in pounds.
 - c. The percent by weight VOC of each paint mixed.
 - d. The total combined monthly VOC emissions based upon the solvent input rate equation listed in term A.2.b, in tons per month.
 - e. The updated rolling, 12-month summation of VOC emissions based upon the solvent input rate equation listed in term A.2.b (the summation of the current month's emission total and the previous eleven calendar months emission totals).
 - f. The total combined monthly VOC emissions, in tons per month.
 - g. The updated rolling, 12-month summation of VOC emissions (the summation of the current month's emission total and the previous eleven calendar months emission totals).
2. The permittee shall collect and record the following information each month for determining the particulate matter emissions:
 - a. The name and identification of each batch of paint produced.
 - b. The total amount of solids used in the formulation of paints, in pounds.
 - c. The total monthly PM emissions, in tons per month.

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PTI A

Emissions Unit ID: **P002**

Issued: To be entered upon final issuance

3. The permittee shall collect and record the following information each month for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027:

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PTI A

Emissions Unit ID: P002

Issued: To be entered upon final issuance

- a. The name and identification number of each batch of paint produced containing a HAP(s).
- b. The number of pounds of each batch of paint produced.
- c. The individual Hazardous Air Pollutant (HAP) content for each HAP per pound of paint produced in pounds of individual HAP per pound of paint.
- d. The total combined HAP content of each paint in pounds of combined HAPs per pound of paint [sum all the individual HAP contents from (c)].
- e. The total individual HAP emissions for each HAP from all paints employed in pounds or tons per month [for each individual HAP, the summation of (b) x 1.5 percent x (c)].
- f. The total combined HAP emissions from all paints employed in pounds or tons per month [the summation of (b) x 1.5 percent x (d)].
- g. The updated rolling, 12-month summation for individual HAP emissions for each HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
- h. The updated rolling, 12-month summation for total combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.

D. Reporting Requirements

1. The permittee shall submit annual reports which specify the total organic compound emissions from emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027. These reports shall be submitted by January 30 of each year and cover the previous calendar year.
2. The permittee shall submit annual reports which specify the particulate matter emissions from this emissions units. These reports shall be submitted by January 30 of each year and cover the previous calendar year.
3. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County

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Department of Environmental Services which identify all exceedances of the 12-month VOC emissions limitations listed in Sections A.1 and 2.b. If no deviations occurred during the reporting period, the permittee shall state so in the report.

Huntin

PTI A

Emissions Unit ID: **P002**

Issued: To be entered upon final issuance

4. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month HAPs emissions limitations in Section A.2.c. If no deviations occurred during the reporting period, the permittee shall state so in the report.
5. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emission limitations in Sections A.1 and 2 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

71.1 lbs/day of VOC

Applicable Compliance Method:

The daily VOC emission rate is based on the emission unit's potential to emit. The potential to emit was calculated by: (maximum production rate in pounds per hour) x (the percent by weight VOC) x (emission factor of 1.5%).

- b. Emission Limitation:

8.8 lbs/day of PE-PM10

Applicable Compliance Method:

The daily PE-PM10 emission rate is based on the emissions unit's potential to emit. The potential to emit was calculated by: (maximum production rate in pounds per hour) x (the percent by weight PM) x (emission factor of 1.0%).

- c. Emission Limitation:

Volatile organic compound (VOC) emissions based upon the solvent input rate equation listed in term A.2.b shall not exceed 39.9 TPY for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 combined, based upon a rolling, 12-month summation.

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Emissions Unit ID: P002

Issued: To be entered upon final issuance

Applicable Compliance Method:

Compliance with the annual volatile organic compound emissions based upon the solvent input rate equation listed in term A.2.b shall be based upon the record keeping requirements as specified in Section C.1.

d. Emission Limitation:

Volatile organic compound (VOC) emissions shall not exceed 39.9 TPY for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 combined, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the annual volatile organic compound emission limitations in term A.1 shall be based upon the record keeping requirements as specified in Section C.1.

e. Emission Limitation:

1.61 TPY of PE-PM10

Applicable Compliance Limitation:

Compliance with the annual particulate emission limitations in term A.1 shall be based upon the record keeping requirements as specified in Section C.2.

f. Emissions Limitations:

9.9 TPY for any single HAP and 24.9 TPY for combined HAPs.

Applicable Compliance Method:

Compliance with the HAP emission limitations in term A.2.c will be determined by the record keeping requirements specified in Section C.3.

g. Emissions Limitations:

Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule.

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Emissions Unit ID: **P002**

Issued: To be entered upon final issuance

Fugitive visible particulate emissions shall not exceed twenty percent (20%) opacity, as a three-minute average.

Applicable Compliance Method

Compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996.

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PTI A
Issued

Facility ID: 1431480257

Emissions Unit ID: P002

F. Miscellaneous Requirements

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

Hunti

PTI A

Emissions Unit ID: P003

Issued: To be entered upon final issuance

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>
P003 - High Speed Dispersion Mixer 105 (modification)	OAC rule 3745-31-05(A)(3)
	OAC rule 3745-17-07(A)(1)
	OAC rule 3745-17-07(B)(1)
	OAC rule 3745-17-08(B)
	OAC rule 3745-21-07(G)
	OAC rule 3745-17-11
	OAC rule 3745-31-05(C)

Hunti

PTI A

Emissions Unit ID: P003

Issued: To be entered upon final issuance

Applicable Emissions
Limitations/Control Measures

Volatile organic compound (VOC) emissions from the mixer shall not exceed 71.1 pounds per day.

Particulate emissions (PE) from the mixer shall not exceed 8.8 pounds per day and 1.61 tons per year (TPY).

PE = PM10

See Section A.2.a.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1), OAC rule 3745-17-07(B)(1), OAC rule 3745-17-08(B) and OAC rule 3745-31-05(C).

Volatile organic compound (VOC) emissions shall not exceed 39.9 TPY for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 combined, based upon a rolling, 12-month summation

See Sections A.2.b and A.2.c.

See Section A.2.d.

See Section A.2.e

The permittee shall minimize or eliminate visible particulate emissions by the use of a cover and dust collector.

Exempt

The emission limitation specified by this rule is less stringent than the requirements of OAC rule 3745-31-05(A)(3).

Hunt

PTI A

Emissions Unit ID: P003

Issued: To be entered upon final issuance

2. Additional Terms and Conditions

2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emissions limitations and use of a cover and dust collector.

2.b Paint production shall not result in an exceedance of the following emission limitations and /or control requirements:

The permittee shall emit no more than 39.9 tons of VOC per rolling, 12-month period based upon the monthly solvent input rates to emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 combined.

Monthly solvent input rate = $(A \times B \times C)/2000$ where A = the number of pounds of each paint mixed per month, B = the percent by weight solvent of each paint mixed, and C = 0.015 (emission factor for amount of VOC emitted in lbs of VOC per lb of solvent in the paint).

The permittee has existing records to demonstrate compliance upon issuance of the permit.

2.c The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

2.d Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.

2.e Fugitive visible particulate emissions shall not exceed 20 percent opacity, as a three-minute average.

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Emissions Unit ID: **P003**

Issued: To be entered upon final issuance

- 2.f** The daily VOC and the daily and annual PE-PM10 emissions limitations outlined are based upon the emissions unit's Potential To Emit (PTE). Therefore, no records are required to demonstrate compliance with these limits.

B. Operational Restrictions

1. None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027:
 - a. The name and identification of each batch of paint produced.
 - b. The amount of each paint produced, in pounds.
 - c. The percent by weight VOC of each paint mixed.
 - d. The total combined monthly VOC emissions based upon the solvent input rate equation listed in term A.2.b, in tons per month.
 - e. The updated rolling, 12-month summation of VOC emissions based upon the solvent input rate equation listed in term A.2.b (the summation of the current month's emission total and the previous eleven calendar months emission totals).
 - f. The total combined monthly VOC emissions, in tons per month.
 - g. The updated rolling, 12-month summation of VOC emissions (the summation of the current month's emission total and the previous eleven calendar months emission totals).
2. The permittee shall collect and record the following information each month for determining the particulate matter emissions:
 - a. The name and identification of each batch of paint produced.
 - b. The total amount of solids used in the formulation of paints, in pounds.
 - c. The total monthly PM emissions, in tons per month.

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3. The permittee shall collect and record the following information each month for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027:
 - a. The name and identification number of each batch of paint produced containing a HAP(s).
 - b. The number of pounds of each batch of paint produced.
 - c. The individual Hazardous Air Pollutant (HAP) content for each HAP per pound of paint produced in pounds of individual HAP per pound of paint.
 - d. The total combined HAP content of each paint in pounds of combined HAPs per pound of paint [sum all the individual HAP contents from (c)].
 - e. The total individual HAP emissions for each HAP from all paints employed in pounds or tons per month [for each individual HAP, the summation of (b) x 1.5 percent x (c)].
 - f. The total combined HAP emissions from all paints employed in pounds or tons per month [the summation of (b) x 1.5 percent x (d)].
 - g. The updated rolling, 12-month summation for individual HAP emissions for each HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
 - h. The updated rolling, 12-month summation for total combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.

D. Reporting Requirements

1. The permittee shall submit annual reports which specify the total organic compound emissions from emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027. These reports shall be submitted by January 30 of each year and cover the previous calendar year.
2. The permittee shall submit annual reports which specify the particulate matter emissions from this emissions units. These reports shall be submitted by January 30 of each year and cover the previous calendar year.

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Emissions Unit ID: P003

Issued: To be entered upon final issuance

3. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the 12-month VOC emissions limitations listed in Sections A.1 and 2.b. If no deviations occurred during the reporting period, the permittee shall state so in the report.
4. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month HAPs emissions limitations in Section A.2.c. If no deviations occurred during the reporting period, the permittee shall state so in the report.
5. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emission limitations in Sections A.1 and 2 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

71.1 lbs/day of VOC.

Applicable Compliance Method:

The daily VOC emission rate is based on the emission unit's potential to emit. The potential to emit was calculated by: (maximum production rate in pounds per hour) x (the percent by weight VOC) x (emission factor of 1.5%).
 - b. Emission Limitation:

8.8 lbs/day of PE-PM10.

Applicable Compliance Method:

The daily PE-PM10 emission rate is based on the emissions unit's potential to emit. The potential to emit was calculated by: (maximum production rate in pounds per hour) x (the percent by weight PM) x (emission factor of 1.0%).
 - c. Emission Limitation:

Emissions Unit ID: **P003**

Volatile organic compound emissions based upon the solvent input rate equation listed in term A.2.b shall not exceed 39.9 TPY for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 combined, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the annual volatile organic compound emissions based upon the solvent input rate equation listed in term A.2.b shall be based upon the record keeping requirements as specified in Section C.1.

d. Emission Limitation:

Volatile organic compound (VOC) emissions shall not exceed 39.9 TPY for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 combined, based upon a rolling, 12-month summation

Applicable Compliance Method:

Compliance with the annual volatile organic compound emission limitations in term A.1 shall be based upon the record keeping requirements as specified in Section C.1.

e. Emission Limitation:

1.61 TPY of PE-PM10.

Applicable Compliance Limitation:

Compliance with the annual particulate emission limitations in term A.1 shall be based upon the record keeping requirements as specified in Section C.2.

f. Emissions Limitations:

9.9 TPY for any single HAP and 24.9 TPY for combined HAPs

Applicable Compliance Method:

Compliance with the HAP emission limitations in term A.2.c will be determined by the record keeping requirements specified in Section C.3.

g. Emissions Limitations:

Hunti

PTI A

Emissions Unit ID: **P003**

Issued: To be entered upon final issuance

Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule.

Fugitive visible particulate emissions shall not exceed twenty percent (20%) opacity, as a three-minute average.

Applicable Compliance Method

Compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996.

F. Miscellaneous Requirements

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

Hunti

PTI A

Emissions Unit ID: P004

Issued: To be entered upon final issuance

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>
P004 - High Speed Dispersion Mixer 106 (modification)	OAC rule 3745-31-05(A)(3)
	OAC rule 3745-17-07(A)(1)
	OAC rule 3745-17-07(B)(1)
	OAC rule 3745-17-08(B)
	OAC rule 3745-21-07(G)
	OAC rule 3745-17-11
	OAC rule 3745-31-05(C)

Hunti

PTI A

Emissions Unit ID: P004

Issued: To be entered upon final issuance

Applicable Emissions
Limitations/Control Measures

Volatile organic compound (VOC) emissions from the mixer shall not exceed 147.5 pounds per day.

Particulate emissions (PE) from the mixer shall not exceed 18.5 pounds per day and 3.37 tons per year (TPY).

PE = PM10

See Section A.2.a.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1), OAC rule 3745-17-07(B)(1), OAC rule 3745-17-08(B) and OAC rule 3745-31-05(C).

Volatile organic compound (VOC) emissions shall not exceed 39.9 TPY for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 combined, based upon a rolling, 12-month summation

See Sections A.2.b and A.2.c.

See Section A.2.d.

See Section A.2.e

The permittee shall minimize or eliminate visible particulate emissions by the use of a cover and dust collector.

Exempt

The emission limitation specified by this rule is less stringent than the requirements of OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emissions limitations and use of a cover and dust collector.

2.b Paint production shall not result in an exceedance of the following emission limitations and /or control requirements:

The permittee shall emit no more than 39.9 tons of VOC per rolling, 12-month period based upon the monthly solvent input rates to emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 combined.

Monthly solvent input rate = $(A \times B \times C)/2000$ where A = the number of pounds of each paint mixed per month, B = the percent by weight solvent of each paint mixed, and C = 0.015 (emission factor for amount of VOC emitted in lbs of VOC per lb of solvent in the paint).

The permittee has existing records to demonstrate compliance upon issuance of the permit.

2.c The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

2.d Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.

2.e Fugitive visible particulate emissions shall not exceed 20 percent opacity, as a three-minute average.

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Emissions Unit ID: P004

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- 2.f The daily VOC and the daily and annual PE-PM10 emissions limitations outlined are based upon the emissions unit's Potential To Emit (PTE). Therefore, no records are required to demonstrate compliance with these limits.

B. Operational Restrictions

1. None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027:
- a. The name and identification of each batch of paint produced.
 - b. The amount of each paint produced, in pounds.
 - c. The percent by weight VOC of each paint mixed.
 - d. The total combined monthly VOC emissions based upon the solvent input rate equation listed in term A.2.b, in tons per month.
 - e. The updated rolling, 12-month summation of VOC emissions based upon the solvent input rate equation listed in term A.2.b (the summation of the current month's emission total and the previous eleven calendar months emission totals).
 - f. The total combined monthly VOC emissions, in tons per month.
 - g. The updated rolling, 12-month summation of VOC emissions (the summation of the current month's emission total and the previous eleven calendar months emission totals).
2. The permittee shall collect and record the following information each month for determining the particulate matter emissions:
- a. The name and identification of each batch of paint produced.
 - b. The total amount of solids used in the formulation of paints, in pounds.
 - c. The total monthly PM emissions, in tons per month.

Issued: To be entered upon final issuance

3. The permittee shall collect and record the following information each month for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027:
 - a. The name and identification number of each batch of paint produced containing a HAP(s).
 - b. The number of pounds of each batch of paint produced.
 - c. The individual Hazardous Air Pollutant (HAP) content for each HAP per pound of paint produced in pounds of individual HAP per pound of paint.
 - d. The total combined HAP content of each paint in pounds of combined HAPs per pound of paint [sum all the individual HAP contents from (c)].
 - e. The total individual HAP emissions for each HAP from all paints employed in pounds or tons per month [for each individual HAP, the summation of (b) x 1.5 percent x (c)].
 - f. The total combined HAP emissions from all paints employed in pounds or tons per month [the summation of (b) x 1.5 percent x (d)].
 - g. The updated rolling, 12-month summation for individual HAP emissions for each HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
 - h. The updated rolling, 12-month summation for total combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.

D. Reporting Requirements

1. The permittee shall submit annual reports which specify the total organic compound emissions from emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027. These reports shall be submitted by January 30 of each year and cover the previous calendar year.
2. The permittee shall submit annual reports which specify the particulate matter emissions from this emissions units. These reports shall be submitted by January 30 of each year and cover the previous calendar year.

3. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the 12-month VOC emissions limitations listed in Sections A.1 and 2.b. If no deviations occurred during the reporting period, the permittee shall state so in the report.
4. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month HAPs emissions limitations in Section A.2.c. If no deviations occurred during the reporting period, the permittee shall state so in the report.
5. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emission limitations in Sections A.1 and 2 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

147.5 lbs/day of VOC

Applicable Compliance Method:

The daily VOC emission rate is based on the emission unit's potential to emit. The potential to emit was calculated by: (maximum production rate in pounds per hour) x (the percent by weight VOC) x (emission factor of 1.5%).
 - b. Emission Limitation:

18.5 lbs/day of PE-PM10

Applicable Compliance Method:

The daily PE-PM10 emission rate is based on the emissions unit's potential to emit. The potential to emit was calculated by: (maximum production rate in pounds per hour) x (the percent by weight PM) x (emission factor of 1.0%).
 - c. Emission Limitation:

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Emissions Unit ID: P004

Issued: To be entered upon final issuance

Volatile organic compound emissions based upon the solvent input rate equation listed in term A.2.b shall not exceed 39.9 TPY for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 combined, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the annual volatile organic compound emissions based upon the solvent input rate equation listed in term A.2.b shall be based upon the record keeping requirements as specified in Section C.1.

d. Emission Limitation:

Volatile organic compound (VOC) emissions shall not exceed 39.9 TPY for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 combined, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the annual volatile organic compound emission limitations in term A.1 shall be based upon the record keeping requirements as specified in Section C.1.

e. Emission Limitation:

3.37 TPY of PE-PM10

Applicable Compliance Limitation:

Compliance with the annual particulate emission limitations in term A.1 shall be based upon the record keeping requirements as specified in Section C.2.

f. Emissions Limitations:

9.9 TPY for any single HAP and 24.9 TPY for combined HAPs

Applicable Compliance Method:

Compliance with the HAP emission limitations in term A.2.b will be determined by the record keeping requirements specified in Section C.3.

g. Emissions Limitations:

Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule.

Fugitive visible particulate emissions shall not exceed twenty percent (20%) opacity, as a three-minute average.

Applicable Compliance Method

Compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996.

F. Miscellaneous Requirements

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

Hunti

PTI A

Emissions Unit ID: P005

Issued: To be entered upon final issuance

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>
P005 - High Speed Dispersion Mixer 108 (modification)	OAC rule 3745-31-05(A)(3)
	OAC rule 3745-17-07(A)(1)
	OAC rule 3745-17-07(B)(1)
	OAC rule 3745-17-08(B)
	OAC rule 3745-21-07(G)
	OAC rule 3745-17-11
	OAC rule 3745-31-05(C)

Hunti

PTI A

Emissions Unit ID: P005

Issued: To be entered upon final issuance

Applicable Emissions
Limitations/Control Measures

Volatile organic compound (VOC) emissions from the mixer shall not exceed 146.7 pounds per day.

Particulate emissions (PE) from the mixer shall not exceed 18.4 pounds per day and 3.35 tons per year (TPY).

PE = PM10

See Section A.2.a.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1), OAC rule 3745-17-07(B)(1), OAC rule 3745-17-08(B) and OAC rule 3745-31-05(C).

Volatile organic compound (VOC) emissions shall not exceed 39.9 TPY for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 combined, based upon a rolling, 12-month summation

See Sections A.2.b and A.2.c.

See Section A.2.d.

See Section A.2.e

The permittee shall minimize or eliminate visible particulate emissions by the use of a cover and dust collector.

Exempt

The emission limitation specified by this rule is less stringent than the requirements of OAC rule 3745-31-05(A)(3).

Issued: To be entered upon final issuance

2. Additional Terms and Conditions

2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emissions limitations and use of a cover and dust collector.

2.b Paint production shall not result in an exceedance of the following emission limitations and /or control requirements:

The permittee shall emit no more than 39.9 tons of VOC per rolling, 12-month period based upon the monthly solvent input rates to emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 combined.

Monthly solvent input rate = $(A \times B \times C)/2000$ where A = the number of pounds of each paint mixed per month, B = the percent by weight of solvent of each paint mixed, and C = 0.015 (emission factor for amount of VOC emitted in lbs of VOC per lb of solvent in the paint).

The permittee has existing records to demonstrate compliance upon issuance of the permit.

2.c The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

2.d Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.

2.e Fugitive visible particulate emissions shall not exceed 20 percent opacity, as a three-minute average.

2.f The daily VOC and the daily and annual PM-PM10 emissions limitations outlined are based upon the emissions unit's Potential To Emit (PTE). Therefore, no records are required to demonstrate compliance with these limits.

B. Operational Restrictions

1. None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027:
 - a. The name and identification of each batch of paint produced.
 - b. The amount of each paint produced, in pounds.
 - c. The percent by weight VOC of each paint mixed.
 - d. The total combined monthly VOC emissions based upon the solvent input rate equation listed in term A.2.b, in tons per month.
 - e. The updated rolling, 12-month summation of VOC emissions based upon the solvent input rate equation listed in term A.2.b (the summation of the current month's emission total and the previous eleven calendar months emission totals).
 - f. The total combined monthly VOC emissions, in tons per month.
 - g. The updated rolling, 12-month summation of VOC emissions (the summation of the current month's emission total and the previous eleven calendar months emission totals).
2. The permittee shall collect and record the following information each month for determining the particulate matter emissions:
 - a. The name and identification of each batch of paint produced.
 - b. The total amount of solids used in the formulation of paints, in pounds.
 - c. The total monthly PM emissions, in tons per month.
3. The permittee shall collect and record the following information each month for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027:
 - a. The name and identification number of each batch of paint produced containing a HAP(s).
 - b. The number of pounds of each batch of paint produced.
 - c. The individual Hazardous Air Pollutant (HAP) content for each HAP per pound of paint produced in pounds of individual HAP per pound of paint.

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- d. The total combined HAP content of each paint in pounds of combined HAPs per pound of paint [sum all the individual HAP contents from (c)].
- e. The total individual HAP emissions for each HAP from all paints employed in pounds or tons per month [for each individual HAP, the summation of (b) x 1.5 percent x (c)].
- f. The total combined HAP emissions from all paints employed in pounds or tons per month [the summation of (b) x 1.5 percent x (d)].
- g. The updated rolling, 12-month summation for individual HAP emissions for each HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
- h. The updated rolling, 12-month summation for total combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.

D. Reporting Requirements

- 1. The permittee shall submit annual reports which specify the total organic compound emissions from emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027. These reports shall be submitted by January 30 of each year and cover the previous calendar year.
- 2. The permittee shall submit annual reports which specify the particulate matter emissions from this emissions units. These reports shall be submitted by January 30 of each year and cover the previous calendar year.
- 3. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the 12-month VOC emissions limitations listed in Sections A.1 and 2.b. If no deviations occurred during the reporting period, the permittee shall state so in the report.
- 4. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month HAPs emissions limitations in Section A.2.c. If no deviations occurred during the reporting

period, the permittee shall state so in the report.

5. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emission limitations in Sections A.1 and 2 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

146.7 lbs/day of VOC

Applicable Compliance Method:

The daily VOC emission rate is based on the emission unit's potential to emit. The potential to emit was calculated by: (maximum production rate in pounds per hour) x (the percent by weight VOC) x (emission factor of 1.5%).

- b. Emission Limitation:

18.4 lbs/day of PE-PM10

Applicable Compliance Method:

The daily PE-PM10 emission rate is based on the emissions unit's potential to emit. The potential to emit was calculated by: (maximum production rate in pounds per hour) x (the percent by weight PM) x (emission factor of 1.0%).

- c. Emission Limitation:

Volatile organic compound emissions based upon the solvent input rate equation listed in term A.2.b shall not exceed 39.9 TPY for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 combined, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the annual volatile organic compound emissions based upon the solvent input rate equation listed in term A.2.b shall be based upon the record keeping requirements as specified in Section C.1.

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PTI A

Issued: To be entered upon final issuance

Emissions Unit ID: P005

d. Emission Limitation:

Volatile organic compound (VOC) emissions shall not exceed 39.9 TPY for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 combined, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the annual volatile organic compound emission limitations in term A.1 shall be based upon the record keeping requirements as specified in Section C.1.

e. Emission Limitation:

3.35 TPY of PE-PM10.

Applicable Compliance Limitation:

Compliance with the annual particulate emission limitations in term A.1 shall be based upon the record keeping requirements as specified in Section C.2.

f. Emissions Limitations:

9.9 TPY for any single HAP and 24.9 TPY for combined HAPs

Applicable Compliance Method:

Compliance with the HAP emission limitations in term A.2.c. will be determined by the record keeping requirements specified in Section C.3.

g. Emissions Limitations:

Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule.

Fugitive visible particulate emissions shall not exceed twenty percent (20%) opacity, as a three-minute average.

Applicable Compliance Method

Hunti

PTI A

Emissions Unit ID: **P005**

Issued: To be entered upon final issuance

Compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996.

F. Miscellaneous Requirements

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

Huntin

PTI A

Emissions Unit ID: P006

Issued: To be entered upon final issuance

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>
P006 - Paint Process/Holding Tank 109 (modification)	OAC rule 3745-31-05(A)(3)	Volatile organic compound (VOC) emissions from this emissions unit shall not exceed 0.5 ton per year (TPY).
	OAC rule 3745-31-05(C)	See Section A.2.a. Volatile organic compound (VOC) emissions shall not exceed 39.9 TPY for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 combined, based upon a rolling, 12-month summation
	OAC rule 3745-21-07(G)	See Sections A.2.b and A.2.c. Exempt

2. Additional Terms and Conditions

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emissions limitations and use of submerged fill.
- 2.b Paint production shall not result in an exceedance of the following emission limitations and /or control requirements:

Hunting Industrial Coatings

PTI A

Issued

Facility ID: 1431480257

Emissions Unit ID: **P006**

The permittee shall emit no more than 39.9 tons of VOC per rolling, 12-month period based upon the monthly solvent input rates to emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 combined.

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PTI A

Emissions Unit ID: P006

Issued: To be entered upon final issuance

Monthly solvent input rate = $(A \times B \times C)/2000$ where A = the number of pounds of each paint mixed per month, B = the percent by weight solvent of each paint mixed, and C = 0.015 (emission factor for amount of VOC emitted in lbs of VOC per lb of solvent in the paint).

The permittee has existing records to demonstrate compliance upon issuance of the permit.

- 2.c The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 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.

B. Operational Restrictions

1. None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027:
 - a. The name and identification of each batch of paint produced.
 - b. The amount of each paint produced, in pounds.
 - c. The percent by weight VOC of each paint mixed
 - d. The total combined monthly VOC emissions based upon the solvent input rate equation listed in term A.2.b, in tons per month.
 - e. The updated rolling, 12-month summation of VOC emissions based upon the solvent input rate equation listed in term A.2.b (the summation of the current month's emission total and the previous eleven calendar months emission totals).
 - f. The total combined monthly VOC emissions, in tons per month.
 - g. The updated rolling, 12-month summation of VOC emissions (the summation of the current month's emission total and the previous eleven calendar months emission totals).

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2. The permittee shall collect and record the following information each month for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027:
 - a. The name and identification number of each batch of paint produced containing a HAP(s).
 - b. The number of pounds of each batch of paint produced.
 - c. The individual Hazardous Air Pollutant (HAP) content for each HAP per pound of paint produced in pounds of individual HAP per pound of paint.
 - d. The total combined HAP content of each paint in pounds of combined HAPs per pound of paint [sum all the individual HAP contents from (c)].
 - e. The total individual HAP emissions for each HAP from all paints employed in pounds or tons per month [for each individual HAP, the summation of (b) x 1.5 percent x (c)].
 - f. The total combined HAP emissions from all paints employed in pounds or tons per month [the summation of (b) x 1.5 percent x (d)].
 - g. The updated rolling, 12-month summation for individual HAP emissions for each HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
 - h. The updated rolling, 12-month summation for total combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.

D. Reporting Requirements

1. The permittee shall submit annual reports which specify the total organic compound emissions from emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027. These reports shall be submitted by January 30 of each year and cover the previous calendar year.
2. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the 12-month VOC

emissions limitations listed in Sections A.1 and 2.b. If no deviations occurred during the reporting period, the permittee shall state so in the report.

3. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month HAPs emissions limitations in Section A.2.c. If no deviations occurred during the reporting period, the permittee shall state so in the report.
4. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Terms and Conditions of this permit.

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PTI A

Emissions Unit ID: P006

Issued: To be entered upon final issuance

E. Testing Requirements

1. Compliance with the emission limitations in Sections A.1 and 2 of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Volatile organic compound (VOC) emissions shall not exceed 0.5 TPY

Applicable Compliance Method:

Compliance with the annual volatile organic compound emissions limit is based upon the USEPA Tanks 4.0 program.

b. Emission Limitation:

Volatile organic compound emissions based upon the solvent input rate equation listed in term A.2.b shall not exceed 39.9 TPY for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 combined, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the annual volatile organic compound emissions based upon the solvent input rate equation listed in term A.2.b shall be based upon the record keeping requirements as specified in Section C.1.

c. Emission Limitation:

Volatile organic compound (VOC) emissions shall not exceed 39.9 TPY for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 combined, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the annual volatile organic compound emission limitations in term A.1 shall be based upon the record keeping requirements as specified in Section C.1.

d. Emissions Limitations:

9.9 TPY for any single HAP and 24.9 TPY for combined HAPs.

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PTI A

Issued: To be entered upon final issuance

Emissions Unit ID: **P006**

Applicable Compliance Method:

Compliance with the HAP emission limitations in term A.2.c. shall be determined by the record keeping requirements specified in Section C.2.

F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A, B, C, D, and E.
2. Pursuant to Engineering Guide #69, modeling to demonstrate compliance with the Ohio EPA's Air Toxic Policy was not necessary since the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

Hunti

PTI A

Emissions Unit ID: P007

Issued: To be entered upon final issuance

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>
P007 - High Speed Dispersion Mixer 102 (modification)	OAC rule 3745-31-05(A)(3)
	OAC rule 3745-17-07(A)(1)
	OAC rule 3745-17-07(B)(1)
	OAC rule 3745-17-08(B)
	OAC rule 3745-21-07(G)
	OAC rule 3745-17-11
	OAC rule 3745-31-05(C)

Hunting Industrial Coatings

PTI A

Issued

Facility ID: 1431480257

Emissions Unit ID: P007

Applicable Emissions
Limitations/Control Measures

Volatile organic compound (VOC) emissions from the mixer shall not exceed 133.4 pounds per day.

Particulate emissions (PE) from the mixer shall not exceed 16.6 pounds per day and 3.03 tons per year (TPY).

PE = PM10

See Section A.2.a.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1), OAC rule 3745-17-07(B)(1), OAC rule 3745-17-08(B) and OAC rule 3745-31-05(C).

Volatile organic compound (VOC) emissions shall not exceed 39.9 TPY for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 combined, based upon a rolling, 12-month summation

See Sections A.2.b and A.2.c.

See Section A.2.d.

See Section A.2.e

The permittee shall minimize or

eliminate visible particulate emissions by the use of a cover and dust collector.

Exempt

The emission limitation specified by this rule is less stringent than the requirements of OAC rule 3745-31-05(A)(3).

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PTI A

Emissions Unit ID: P007

Issued: To be entered upon final issuance

2. Additional Terms and Conditions

2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emissions limitations and use of a cover and dust collector.

2.b Paint production shall not result in an exceedance of the following emission limitations and /or control requirements:

The permittee shall emit no more than 39.9 tons of VOC per rolling, 12-month period based upon the monthly solvent input rates to emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 combined.

Monthly solvent input rate = $(A \times B \times C)/2000$ where A = the number of pounds of each paint mixed per month, B = the percent by weight solvent of each paint mixed, and C = 0.015 (emission factor for amount of VOC emitted in lbs of VOC per lb of solvent in the paint).

The permittee has existing records to demonstrate compliance upon issuance of the permit.

2.c The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

2.d Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.

2.e Fugitive visible particulate emissions shall not exceed 20 percent opacity, as a three-minute average.

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Emissions Unit ID: **P007**

Issued: To be entered upon final issuance

- 2.f** The daily VOC and the daily and annual PE-PM10 emissions limitations outlined are based upon the emissions unit's Potential To Emit (PTE). Therefore, no records are required to demonstrate compliance with these limits.

B. Operational Restrictions

1. None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027:
 - a. The name and identification of each batch of paint produced.
 - b. The amount of each paint produced, in pounds.
 - c. The percent by weight VOC of each paint mixed.
 - d. The total combined monthly VOC emissions based upon the solvent input rate equation listed in term A.2.b, in tons per month.
 - e. The updated rolling, 12-month summation of VOC emissions based upon the solvent input rate equation listed in term A.2.b (the summation of the current month's emission total and the previous eleven calendar months emission totals).
 - f. The total combined monthly VOC emissions, in tons per month.
 - g. The updated rolling, 12-month summation of VOC emissions (the summation of the current month's emission total and the previous eleven calendar months emission totals).
2. The permittee shall collect and record the following information each month for determining the particulate matter emissions:
 - a. The name and identification of each batch of paint produced.
 - b. The total amount of solids used in the formulation of paints, in pounds.
 - c. The total monthly PM emissions, in tons per month.

Emissions Unit ID: **P007**

3. The permittee shall collect and record the following information each month for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027:
 - a. The name and identification number of each batch of paint produced containing a HAP(s).
 - b. The number of pounds of each batch of paint produced.
 - c. The individual Hazardous Air Pollutant (HAP) content for each HAP per pound of paint produced in pounds of individual HAP per pound of paint.
 - d. The total combined HAP content of each paint in pounds of combined HAPs per pound of paint [sum all the individual HAP contents from (c)].
 - e. The total individual HAP emissions for each HAP from all paints employed in pounds or tons per month [for each individual HAP, the summation of (b) x 1.5 percent x (c)].
 - f. The total combined HAP emissions from all paints employed in pounds or tons per month [the summation of (b) x 1.5 percent x (d)].
 - g. The updated rolling, 12-month summation for individual HAP emissions for each HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
 - h. The updated rolling, 12-month summation for total combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.

D. Reporting Requirements

1. The permittee shall submit annual reports which specify the total organic compound emissions from emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027. These reports shall be submitted by January 30 of each year and cover the previous calendar year.
2. The permittee shall submit annual reports which specify the particulate matter emissions from this emissions units. These reports shall be submitted by January 30 of each year and cover the previous calendar year.

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Emissions Unit ID: P007

Issued: To be entered upon final issuance

3. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the 12-month VOC emissions limitations listed in Sections A.1 and 2.b. If no deviations occurred during the reporting period, the permittee shall state so in the report.
4. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month HAPs emissions limitations in Section A.2.c. If no deviations occurred during the reporting period, the permittee shall state so in the report.
5. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emission limitations in Sections A.1 and 2 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

133.4 lbs/day of VOC.

Applicable Compliance Method:

The daily VOC emission rate is based on the emission unit's potential to emit. The potential to emit was calculated by: (maximum production rate in pounds per hour) x (the percent by weight VOC) x (emission factor of 1.5%).

- b. Emission Limitation:

16.6 lbs/day of PE-PM10

Applicable Compliance Method:

The daily PE-PM10 emission rate is based on the emissions unit's potential to emit. The potential to emit was calculated by: (maximum production rate in pounds per hour) x (the percent by weight PM) x (emission factor of 1.0%).

- c. Emission Limitation:

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Emissions Unit ID: P007

Issued: To be entered upon final issuance

Volatile organic compound emissions based upon the solvent input rate equation listed in term A.2.b shall not exceed 39.9TPY for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 combined, based upon a rolling, 12-month summation

Applicable Compliance Method:

Compliance with the annual volatile organic compound emissions based upon the solvent input rate equation listed in term A.2.b shall be based upon the record keeping requirements as specified in Section C.1.

d. Emission Limitation:

Volatile organic compound (VOC) emissions shall not exceed 39.9TPY for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 combined, based upon a rolling, 12-month summation

Applicable Compliance Method:

Compliance with the annual volatile organic compound emission limitations in term A.1 shall be based upon the record keeping requirements as specified in Section C.1.

e. Emission Limitation:

3.03 TPY of PE-PM10

Applicable Compliance Limitation:

Compliance with the annual particulate emission limitations in term A.1 shall be based upon the record keeping requirements as specified in Section C.2.

f. Emissions Limitations:

9.9 TPY for any single HAP and 24.9 TPY for combined HAPs

Applicable Compliance Method:

Compliance with the HAP emission limitations in term A.2.c will be determined by the record keeping requirements specified in Section C.3.

g. Emissions Limitations:

Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule.

Fugitive visible particulate emissions shall not exceed twenty percent (20%) opacity, as a three-minute average.

Applicable Compliance Method

Compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996.

F. Miscellaneous Requirements

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

Issued: To be entered upon final issuance

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>
P008 - Paint Process/Holding Tank 149 (modification)	OAC rule 3745-31-05(A)(3)	<p>Volatile organic compound (VOC) emissions from the tank shall not exceed 0.5 ton per year (TPY).</p> <p>See Section A.2.a.</p>
	OAC rule 3745-31-05(C)	<p>Volatile organic compound (VOC) emissions shall not exceed 39.9 TPY for emissions units P001 - P008, P010 - P013, P016, P017, and P021 - P027 combined, based upon a rolling, 12-month summation</p> <p>See Sections A.2.b and A.2.c.</p>
	OAC rule 3745-21-07(G)	Exempt

2. Additional Terms and Conditions

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emissions limitations and use of submerged fill.
- 2.b Paint production shall not result in an exceedance of the following emission limitations and/or control requirements:

The permittee shall emit no more than 39.9 tons of VOC per rolling, 12-month period

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PTI A

Emissions Unit ID: **P008**

Issued: To be entered upon final issuance

based upon the monthly solvent input rates to emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 combined.

Monthly solvent input rate = $(A \times B \times C)/2000$ where A = the number of pounds of each paint mixed per month, B = the percent by weight solvent of each paint mixed, and C = 0.015 (emission factor for amount of VOC emitted in lbs of VOC per lb of solvent in the paint).

The permittee has existing records to demonstrate compliance upon issuance of the permit.

- 2.c** The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 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.

B. Operational Restrictions

1. None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027:
 - a. The name and identification of each batch of paint produced.
 - b. The amount of each paint produced, in pounds.
 - c. The percent by weight VOC of each paint mixed
 - d. The total combined monthly VOC emissions based upon the solvent input rate equation listed in term A.2.b, in tons per month.
 - e. The updated rolling, 12-month summation of VOC emissions based upon the solvent input rate equation listed in term A.2.b (the summation of the current month's emission total and the previous eleven calendar months emission totals).
 - f. The total combined monthly VOC emissions, in tons per month.

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2. The permittee shall quarterly submit deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the 12-month VOC emissions limitations listed in Sections A.1 and 2.b. If no deviations occurred during the reporting period, the permittee shall state so in the report.
3. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month HAPs emissions limitations in Section A.2.c. If no deviations occurred during the reporting period, the permittee shall state so in the report.
4. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emission limitations in Sections A.1 and 2 of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Volatile organic compound (VOC) emissions shall not exceed 0.5 TPY

Applicable Compliance Method:

Compliance with the annual volatile organic compound emissions limit is based upon the USEPA Tanks 4.0 program.

b. Emission Limitation:

Volatile organic compound emissions based upon the solvent input rate equation listed in term A.2.b shall not exceed 39.9 TPY for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 combined, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the annual volatile organic compound emissions based upon the solvent input rate equation listed in term A.2.b shall be based upon the record keeping requirements as specified in Section C.1.

c. Emission Limitation:

Volatile organic compound (VOC) emissions shall not exceed 39.9 TPY for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 combined, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the annual volatile organic compound emission limitations in term A.1 shall be based upon the record keeping requirements as specified in Section C.1.

d. Emissions Limitations:

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Issued

Facility ID: 1431480257

Emissions Unit ID: **P008**

9.9 TPY for any single HAP and 24.9 TPY for combined HAPs

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Emissions Unit ID: **P008**

Issued: To be entered upon final issuance

Applicable Compliance Method:

Compliance with the HAP emission limitations in term A.2.c shall be determined by the record keeping requirements specified in Section C.2.

F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A, B, C, D, and E..
2. Pursuant to Engineering Guide #69, modeling to demonstrate compliance with the Ohio EPA's Air Toxic Policy was not necessary since the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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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>
P010 - Paint Process/Holding Tank 110 (modification)	OAC rule 3745-31-05(A)(3)	Volatile organic compound (VOC) emissions from the tank shall not exceed 0.3 ton per year (TPY). See Section A.2.a.
	OAC rule 3745-31-05(C)	Volatile organic compound (VOC) emissions shall not exceed 39.9 TPY for emissions units P001 - P008, P010 - P013, P016, P017, and P021 - P027 combined, based upon a rolling, 12-month summation See Sections A.2.b and A.2.c.
	OAC rule 3745-21-07(G)	Exempt

2. Additional Terms and Conditions

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emissions limitations and use of submerged fill.
- 2.b Paint production shall not result in an exceedance of the following emission limitations and /or control requirements:

The permittee shall emit no more than 40 tons of VOC per rolling, 12-month period

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based upon the monthly solvent input rates to emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 combined.

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Monthly solvent input rate = $(A \times B \times C)/2000$ where A = the number of pounds of each paint mixed per month, B = the percent by weight solvent of each paint mixed, and C = 0.015 (emission factor for amount of VOC emitted in lbs of VOC per lb of solvent in the paint).

The permittee has existing records to demonstrate compliance upon issuance of the permit.

- 2.c The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 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.

B. Operational Restrictions

1. None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027:
 - a. The name and identification of each batch of paint produced.
 - b. The amount of each paint produced, in pounds.
 - c. The percent by weight VOC of each paint mixed
 - d. The total combined monthly VOC emissions based upon the solvent input rate equation listed in term A.2.b, in tons per month.
 - e. The updated rolling, 12-month summation of VOC emissions based upon the solvent input rate equation listed in term A.2.b (the summation of the current month's emission total and the previous eleven calendar months emission totals).
 - f. The total combined monthly VOC emissions, in tons per month.
 - g. The updated rolling, 12-month summation of VOC emissions (the summation of the

current month's emission total and the previous eleven calendar months emission totals).

2. The permittee shall collect and record the following information each month for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027:
 - a. The name and identification number of each batch of paint produced containing a HAP(s).
 - b. The number of pounds of each batch of paint produced.
 - c. The individual Hazardous Air Pollutant (HAP) content for each HAP per pound of paint produced in pounds of individual HAP per pound of paint.
 - d. The total combined HAP content of each paint in pounds of combined HAPs per pound of paint [sum all the individual HAP contents from (c)].
 - e. The total individual HAP emissions for each HAP from all paints employed in pounds or tons per month [for each individual HAP, the summation of (b) x 1.5 percent x (c)].
 - f. The total combined HAP emissions from all paints employed in pounds or tons per month [the summation of (b) x 1.5 percent x (d)].
 - g. The updated rolling, 12-month summation for individual HAP emissions for each HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
 - h. The updated rolling, 12-month summation for total combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.

D. Reporting Requirements

1. The permittee shall submit annual reports which specify the total organic compound emissions from emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027. These reports shall be submitted by January 30 of each year and cover the previous calendar year.
2. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the 12-month VOC

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emissions limitations listed in Sections A.1 and 2.b. If no deviations occurred during the reporting period, the permittee shall state so in the report.

3. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month HAPs emissions limitations in Section A.2.c. If no deviations occurred during the reporting period, the permittee shall state so in the report.
4. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emission limitations in Sections A.1 and 2 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

Volatile organic compound (VOC) emissions shall not exceed 0.3 TPY

Applicable Compliance Method:

Compliance with the annual volatile organic compound emissions limit is based upon the USEPA Tanks 4.0 program.

- b. Emission Limitation:

Volatile organic compound emissions based upon the solvent input rate equation listed in term A.2.b shall not exceed 39.9 TPY for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 combined, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the annual volatile organic compound emissions based upon the solvent input rate equation listed in term A.2.b shall be based upon the record keeping requirements as specified in Section C.1.

- c. Emission Limitation:

Volatile organic compound (VOC) emissions shall not exceed 49.9 TPY for emissions

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units P001 - P008, P010 - P013, P016, P017 and P021 - P027 combined, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the annual volatile organic compound emission limitations in term A.1 shall be based upon the record keeping requirements as specified in Section C.1.

d. Emissions Limitations:

9.9 TPY for any single HAP and 24.9 TPY for combined HAPs

Applicable Compliance Method:

Compliance with the HAP emission limitations in term A.2.c shall be determined by the record keeping requirements specified in Section C.2.

F. Miscellaneous Requirements

1. The terms and conditions in this permit supersede Permit to Install 14-03168, as issued on September 1, 2003.
2. The following terms and conditions of this permit are federally enforceable: A, B, C, D, and E.
3. Pursuant to Engineering Guide #69, modeling to demonstrate compliance with the Ohio EPA's Air Toxic Policy was not necessary since the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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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>
P011 - High Speed Dispersion Mixer 107 (modification)	OAC rule 3745-31-05(A)(3)
	OAC rule 3745-17-07(A)(1)
	OAC rule 3745-17-07(B)(1)
	OAC rule 3745-17-08(B)
	OAC rule 3745-21-07(G)
	OAC rule 3745-17-11
	OAC rule 3745-31-05(C)

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Applicable Emissions
Limitations/Control Measures

Volatile organic compound (VOC) emissions from the mixer shall not exceed 106.8 pounds per day.

Particulate emissions (PE) from the mixer shall not exceed 13.3 pounds per day and 2.42 tons per year (TPY).

PE = PM10

See Section A.2.a.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1), OAC rule 3745-17-07(B)(1), OAC rule 3745-17-08(B) and OAC rule 3745-31-05(C).

Volatile organic compound (VOC) emissions shall not exceed 39.9 TPY for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 combined, based upon a rolling, 12-month summation

See Sections A.2.b and A.2.c.

See Section A.2.d.

See Section A.2.e

The permittee shall minimize or eliminate visible particulate emissions by the use of a cover and dust collector.

Exempt

The emission limitation specified by this rule is less stringent than the requirements of OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emissions limitations and use of a cover and dust collector.

2.b Paint production shall not result in an exceedance of the following emission limitations and /or control requirements:

The permittee shall emit no more than 39.9 tons of VOC per rolling, 12-month period based upon the monthly solvent input rates to emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 combined.

Monthly solvent input rate = $(A \times B \times C)/2000$ where A = the number of pounds of each paint mixed per month, B = the percent by weight solvent of each paint mixed, and C = 0.015 (emission factor for amount of VOC emitted in lbs of VOC per lb of solvent in the paint).

The permittee has existing records to demonstrate compliance upon issuance of the permit.

2.c The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

2.d Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.

2.e Fugitive visible particulate emissions shall not exceed 20 percent opacity, as a three-minute average.

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- 2.f The daily VOC and the daily and annual PE-PM10 emissions limitations outlined are based upon the emissions unit's Potential To Emit (PTE). Therefore, no records are required to demonstrate compliance with these limits.

B. Operational Restrictions

1. None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027:
- a. The name and identification of each batch of paint produced.
 - b. The amount of each paint produced, in pounds.
 - c. The percent by weight VOC of each paint mixed
 - d. The total combined monthly VOC emissions based upon the solvent input rate equation listed in term A.2.b, in tons per month.
 - e. The updated rolling, 12-month summation of VOC emissions based upon the solvent input rate equation listed in term A.2.b (the summation of the current month's emission total and the previous eleven calendar months emission totals).
 - f. The total combined monthly VOC emissions, in tons per month.
 - g. The updated rolling, 12-month summation of VOC emissions (the summation of the current month's emission total and the previous eleven calendar months emission totals).
2. The permittee shall collect and record the following information each month for determining the particulate matter emissions:
- a. The name and identification of each batch of paint produced.
 - b. The total amount of solids used in the formulation of paints, in pounds.
 - c. The total monthly PM emissions, in tons per month.

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3. The permittee shall collect and record the following information each month for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027:
 - a. The name and identification number of each batch of paint produced containing a HAP(s).
 - b. The number of pounds of each batch of paint produced.
 - c. The individual Hazardous Air Pollutant (HAP) content for each HAP per pound of paint produced in pounds of individual HAP per pound of paint.
 - d. The total combined HAP content of each paint in pounds of combined HAPs per pound of paint [sum all the individual HAP contents from (c)].
 - e. The total individual HAP emissions for each HAP from all paints employed in pounds or tons per month [for each individual HAP, the summation of (b) x 1.5 percent x (c)].
 - f. The total combined HAP emissions from all paints employed in pounds or tons per month [the summation of (b) x 1.5 percent x (d)].
 - g. The updated rolling, 12-month summation for individual HAP emissions for each HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
 - h. The updated rolling, 12-month summation for total combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.

D. Reporting Requirements

1. The permittee shall submit annual reports which specify the total organic compound emissions from emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027. These reports shall be submitted by January 30 of each year and cover the previous calendar year.
2. The permittee shall submit annual reports which specify the particulate matter emissions from this emissions units. These reports shall be submitted by January 30 of each year and cover the

previous calendar year.

3. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the 12-month VOC emissions limitations listed in Sections A.1 and 2.b. If no deviations occurred during the reporting period, the permittee shall state so in the report.
4. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month HAPs emissions limitations in Section A.2.c. If no deviations occurred during the reporting period, the permittee shall state so in the report.
5. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emission limitations in Sections A.1 and 2 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

106.8 lbs/day of VOC.

Applicable Compliance Method:

The daily VOC emission rate is based on the emission unit's potential to emit. The potential to emit was calculated by: (maximum production rate in pounds per hour) x (the percent by weight VOC) x (emission factor of 1.5%).
 - b. Emission Limitation:

13.3 lbs/day of PE-PM10.

Applicable Compliance Method:

The daily PE-PM10 emission rate is based on the emissions unit's potential to emit. The potential to emit was calculated by: (maximum production rate in pounds per hour) x (the percent by weight PM) x (emission factor of 1.0%).
 - c. Emission Limitation:

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Volatile organic compound emissions based upon the solvent input rate equation listed in term A.2.b shall not exceed 39.9 TPY for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 combined, based upon a rolling, 12-month summation

Applicable Compliance Method:

Compliance with the annual volatile organic compound emissions based upon the solvent input rate equation listed in term A.2.b shall be based upon the record keeping requirements as specified in Section C.1.

d. Emission Limitation:

Volatile organic compound (VOC) emissions shall not exceed 39.9 TPY for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 combined, based upon a rolling, 12-month summation

Applicable Compliance Method:

Compliance with the annual volatile organic compound emission limitations in term A.1 shall be based upon the record keeping requirements as specified in Section C.1.

e. Emission Limitation:

2.42 TPY of PE-PM10.

Applicable Compliance Limitation:

Compliance with the annual particulate emission limitations in term A.1 shall be based upon the record keeping requirements as specified in Section C.2.

f. Emissions Limitations:

9.9 TPY for any single HAP and 24.9 TPY for combined HAPs

Applicable Compliance Method:

Compliance with the HAP emission limitations in term A.2.c will be determined by the record keeping requirements specified in Section C.3.

g. Emissions Limitations:

Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule.

Fugitive visible particulate emissions shall not exceed twenty percent (20%) opacity, as a three-minute average.

Applicable Compliance Method

Compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996.

F. Miscellaneous Requirements

1. The terms and conditions in this permit supersede Permit to Install 14-03168, as issued on September 1, 2003.
2. The following terms and conditions of this permit are federally enforceable: A, B, C, D, and E.

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>
P012 - High Speed Dispersion Mixer 103 (modification)	OAC rule 3745-31-05(A)(3)

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	<u>Applicable Emissions Limitations/Control Measures</u>	
OAC rule 3745-31-05(C)	<p>Volatile organic compound (VOC) emissions from the mixer shall not exceed 133.4 pounds per day.</p> <p>Particulate emissions (PE) from the mixer shall not exceed 16.6 pounds per day and 3.03 tons per year (TPY).</p> <p>PE = PM10</p> <p>See Section A.2.a.</p>	<p>eliminate visible particulate emissions by the use of a cover and dust collector.</p> <p>Exempt</p> <p>The emission limitation specified by this rule is less stringent than the requirements of OAC rule 3745-31-05(A)(3).</p>
OAC rule 3745-17-07(A)(1)	<p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1), OAC rule 3745-17-07(B)(1), OAC rule 3745-17-08(B) and OAC rule 3745-31-05(C).</p>	
OAC rule 3745-17-07(B)(1)		
OAC rule 3745-17-08(B)		
OAC rule 3745-21-07(G)	<p>Volatile organic compound (VOC) emissions shall not exceed 39.9 TPY for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 combined, based upon a rolling, 12-month summation</p> <p>See Sections A.2.b and A.2.c.</p> <p>See Section A.2.d.</p> <p>See Section A.2.e</p> <p>The permittee shall minimize or</p>	
OAC rule 3745-17-11		

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Emissions Unit ID: **P012**

Issued: To be entered upon final issuance

2. Additional Terms and Conditions

2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emissions limitations and use of a cover and dust collector.

2.b Paint production shall not result in an exceedance of the following emission limitations and /or control requirements:

The permittee shall emit no more than 39.9 tons of VOC per rolling, 12-month period based upon the monthly solvent input rates to emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 combined.

Monthly solvent input rate = $(A \times B \times C)/2000$ where A = the number of pounds of each paint mixed per month, B = the percent by weight of solvent of each paint mixed, and C = 0.015 (emission factor for amount of VOC emitted in lbs of VOC per lb of solvent in the paint).

The permittee has existing records to demonstrate compliance upon issuance of the permit.

2.c The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

2.d Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.

- 2.e** Fugitive visible particulate emissions shall not exceed 20 percent opacity, as a three-minute average.
- 2.f** The daily VOC and the daily and annual PE-PM10 emissions limitations outlined are based upon the emissions unit's Potential To Emit (PTE). Therefore, no records are required to demonstrate compliance with these limits.

B. Operational Restrictions

- 1. None

C. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall collect and record the following information each month for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027:
 - a. The name and identification of each batch of paint produced.
 - b. The amount of each paint produced, in pounds.
 - c. The percent by weight VOC of each paint mixed.
 - d. The total combined monthly VOC emissions based upon the solvent input rate equation listed in term A.2.b, in tons per month.
 - e. The updated rolling, 12-month summation of VOC emissions based upon the solvent input rate equation listed in term A.2.b (the summation of the current month's emission total and the previous eleven calendar months emission totals).
 - f. The total combined monthly VOC emissions, in tons per month.
 - g. The updated rolling, 12-month summation of VOC emissions (the summation of the current month's emission total and the previous eleven calendar months emission totals).
- 2. The permittee shall collect and record the following information each month for determining the particulate matter emissions:
 - a. The name and identification of each batch of paint produced.
 - b. The total amount of solids used in the formulation of paints, in pounds.

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- c. The total monthly PM emissions, in tons per month.

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3. The permittee shall collect and record the following information each month for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027:
 - a. The name and identification number of each batch of paint produced containing a HAP(s).
 - b. The number of pounds of each batch of paint produced.
 - c. The individual Hazardous Air Pollutant (HAP) content for each HAP per pound of paint produced in pounds of individual HAP per pound of paint.
 - d. The total combined HAP content of each paint in pounds of combined HAPs per pound of paint [sum all the individual HAP contents from (c)].
 - e. The total individual HAP emissions for each HAP from all paints employed in pounds or tons per month [for each individual HAP, the summation of (b) x 1.5 percent x (c)].
 - f. The total combined HAP emissions from all paints employed in pounds or tons per month [the summation of (b) x 1.5 percent x (d)].
 - g. The updated rolling, 12-month summation for individual HAP emissions for each HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
 - h. The updated rolling, 12-month summation for total combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.

D. Reporting Requirements

1. The permittee shall submit annual reports which specify the total organic compound emissions from emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027. These reports shall be submitted by January 30 of each year and cover the previous calendar year.
2. The permittee shall submit annual reports which specify the particulate matter emissions from this emissions units. These reports shall be submitted by January 30 of each year and cover the

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previous calendar year.

3. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the 12-month VOC emissions limitations listed in Sections A.1 and 2.b. If no deviations occurred during the reporting period, the permittee shall state so in the report.
4. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month HAPs emissions limitations in Section A.2.c. If no deviations occurred during the reporting period, the permittee shall state so in the report.
5. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emission limitations in Sections A.1 and 2 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

133.4 lbs/day of VOC.

Applicable Compliance Method:

The daily OC emission rate is based on the emission unit's potential to emit. The potential to emit was calculated by: (maximum production rate in pounds per hour) x (the percent by weight VOC) x (emission factor of 1.5%).

- b. Emission Limitation:

16.6 lbs/day of PE-PM10.

Applicable Compliance Method:

The daily PE-PM10 emission rate is based on the emissions unit's potential to emit. The potential to emit was calculated by: (maximum production rate in pounds per hour) x (the percent by weight PM) x (emission factor of 1.0%).

c. Emission Limitation:

Volatile organic compound emissions based upon the solvent input rate equation listed in term A.2.b shall not exceed 39.9 TPY for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 combined, based upon a rolling, 12-month summation.

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Applicable Compliance Method:

Compliance with the annual volatile organic compound emissions based upon the solvent input rate equation listed in term A.2.b shall be based upon the record keeping requirements as specified in Section C.1.

d. Emission Limitation:

Volatile organic compound (VOC) emissions shall not exceed 39.9 TPY for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 combined, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the annual volatile organic compound emission limitations in term A.1 shall be based upon the record keeping requirements as specified in Section C.1.

e. Emission Limitation:

3.03 TPY of PE-PM10.

Applicable Compliance Limitation:

Compliance with the annual particulate emission limitations in term A.1 shall be based upon the record keeping requirements as specified in Section C.2.

e. Emissions Limitations:

9.9 TPY for any single HAP and 24.9 TPY for combined HAPs

Applicable Compliance Method:

Compliance with the HAP emission limitations in term A.2.c will be determined by the record keeping requirements specified in Section C.3.

f. Emissions Limitations:

Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule.

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Fugitive visible particulate emissions shall not exceed twenty percent (20%) opacity, as a three-minute average.

Applicable Compliance Method

Compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996.

F. Miscellaneous Requirements

1. The terms and conditions in this permit supersede Permit to Install 14-03168, as issued on September 1, 2003.
2. The following terms and conditions of this permit are federally enforceable: A, B, C, D, and E.

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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>	
P013 - High Speed Dispersion Mixer 101 (modification)	OAC rule 3745-31-05(A)(3)	OAC rule 3745-17-07(A)(1)
		OAC rule 3745-17-07(B)(1)
		OAC rule 3745-17-08(B)
		OAC rule 3745-21-07(G)
		OAC rule 3745-17-11
	OAC rule 3745-31-05(C)	

Applicable Emissions
Limitations/Control Measures

Volatile organic compound (VOC) emissions from the mixer shall not exceed 44.5 pounds per day.

Particulate emissions (PE) from the mixer shall not exceed 5.6 pounds per day and 1.02 tons per year (TPY).

PE = PM10

See Section A.2.a.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1), OAC rule 3745-17-07(B)(1), OAC rule 3745-17-08(B) and OAC rule 3745-31-05(C).

Volatile organic compound (VOC) emissions shall not exceed 39.9 TPY for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 combined, based upon a rolling, 12-month summation

See Sections A.2.b and A.2.c.

See Section A.2.d.

See Section A.2.e

The permittee shall minimize or

eliminate visible particulate emissions by the use of a cover and dust collector.

Exempt

The emission limitation specified by this rule is less stringent than the requirements of OAC rule 3745-31-05(A)(3).

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Emissions Unit ID: **P013**

Issued: To be entered upon final issuance

2. Additional Terms and Conditions

2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emissions limitations and use of a cover and dust collector.

2.b Paint production shall not result in an exceedance of the following emission limitations and /or control requirements:

The permittee shall emit no more than 39.9 tons of VOC per rolling, 12-month period based upon the monthly solvent input rates to emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 combined.

Monthly solvent input rate = $(A \times B \times C)/2000$ where A = the number of pounds of each paint mixed per month, B = the percent by weight of solvent of each paint mixed, and C = 0.015 (emission factor for amount of VOC emitted in lbs of VOC per lb of solvent in the paint).

The permittee has existing records to demonstrate compliance upon issuance of the permit.

2.c The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

2.d Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.

2.e Fugitive visible particulate emissions shall not exceed 20 percent opacity, as a three-minute average.

2.f The daily VOC and the daily and annual PE-PM10 emissions limitations outlined are based upon the emissions unit's Potential To Emit (PTE). Therefore, no records are required to demonstrate compliance with these limits.

B. Operational Restrictions

1. None

Issued: To be entered upon final issuance

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027:
 - a. The name and identification of each batch of paint produced.
 - b. The amount of each paint produced, in pounds.
 - c. The percent by weight VOC of each paint mixed.
 - d. The total combined monthly VOC emissions based upon the solvent input rate equation listed in term A.2.b, in tons per month.
 - e. The updated rolling, 12-month summation of VOC emissions based upon the solvent input rate equation listed in term A.2.b (the summation of the current month's emission total and the previous eleven calendar months emission totals).
 - f. The total combined monthly VOC emissions, in tons per month.
 - g. The updated rolling, 12-month summation of VOC emissions (the summation of the current month's emission total and the previous eleven calendar months emission totals).
2. The permittee shall collect and record the following information each month for determining the particulate matter emissions:
 - a. The name and identification of each batch of paint produced.
 - b. The total amount of solids used in the formulation of paints, in pounds.
 - c. The total monthly PM emissions, in tons per month.
3. The permittee shall collect and record the following information each month for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027:
 - a. The name and identification number of each batch of paint produced containing a HAP(s).
 - b. The number of pounds of each batch of paint produced.
 - c. The individual Hazardous Air Pollutant (HAP) content for each HAP per pound of paint

produced in pounds of individual HAP per pound of paint.

- d. The total combined HAP content of each paint in pounds of combined HAPs per pound of paint [sum all the individual HAP contents from (c)].
- e. The total individual HAP emissions for each HAP from all paints employed in pounds or tons per month [for each individual HAP, the summation of (b) x 1.5 percent x (c)].
- f. The total combined HAP emissions from all paints employed in pounds or tons per month [the summation of (b) x 1.5 percent x (d)].
- g. The updated rolling, 12-month summation for individual HAP emissions for each HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
- h. The updated rolling, 12-month summation for total combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.

D. Reporting Requirements

1. The permittee shall submit annual reports which specify the total organic compound emissions from emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027. These reports shall be submitted by January 30 of each year and cover the previous calendar year.
2. The permittee shall submit annual reports which specify the particulate matter emissions from this emissions units. These reports shall be submitted by January 30 of each year and cover the previous calendar year.
3. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the 12-month VOC emissions limitations listed in Sections A.1 and 2.b. If no deviations occurred during the reporting period, the permittee shall state so in the report.

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4. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month HAPs emissions limitations in Section A.2.c. If no deviations occurred during the reporting period, the permittee shall state so in the report.
5. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emission limitations in Sections A.1 and 2 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

44.5 lbs/day of VOC.

Applicable Compliance Method:

The daily VOC emission rate is based on the emission unit's potential to emit. The potential to emit was calculated by: (maximum production rate in pounds per hour) x (the percent by weight VOC) x (emission factor of 1.5%).

- b. Emission Limitation:

5.6 lbs/day of PE-PM10.

Applicable Compliance Method:

The daily PE-PM10 emission rate is based on the emissions unit's potential to emit. The potential to emit was calculated by: (maximum production rate in pounds per hour) x (the percent by weight PM) x (emission factor of 1.0%).

- c. Emission Limitation:

Volatile organic compound emissions based upon the solvent input rate equation listed in term A.2.b shall not exceed 39.9 TPY for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 combined, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the annual volatile organic compound emissions based upon the solvent input rate equation listed in term A.2.b shall be based upon the record keeping requirements as specified in Section C.1.

d. Emission Limitation:

Volatile organic compound (VOC) emissions shall not exceed 39.9 TPY for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 combined, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the annual volatile organic compound emission limitations in term A.1 shall be based upon the record keeping requirements as specified in Section C.1.

e. Emission Limitation:

1.02 TPY PE-PM10

Applicable Compliance Limitation:

Compliance with the annual particulate emission limitations in term A.1 shall be based upon the record keeping requirements as specified in Section C.2.

f. Emissions Limitations:

9.9 TPY for any single HAP and 24.9 TPY for combined HAPs

Applicable Compliance Method:

Compliance with the HAP emission limitations in term A.2.c will be determined by the record keeping requirements specified in Section C.3.

g. Emissions Limitations:

Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule.

Fugitive visible particulate emissions shall not exceed twenty percent (20%) opacity, as a three-minute average.

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Applicable Compliance Method

Compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996.

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F. Miscellaneous Requirements

1. The terms and conditions in this permit supersede Permit to Install 14-03168, as issued on September 1, 2003.
2. The following terms and conditions of this permit are federally enforceable: A, B, C, D, and E.

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Emissions Unit ID: P016

Issued: To be entered upon final issuance

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>	
P016 - High Speed Dispersion Mixer 126 (modification)	OAC rule 3745-31-05(A)(3)	OAC rule 3745-17-07(A)(1)
		OAC rule 3745-17-07(B)(1)
		OAC rule 3745-17-08(B)
		OAC rule 3745-21-07(G)
		OAC rule 3745-17-11
		OAC rule 3745-31-05(C)

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Applicable Emissions
Limitations/Control Measures

Volatile organic compound (VOC) emissions from the mixer shall not exceed 147.5 pounds per day.

Particulate emissions (PE) from the mixer shall not exceed 18.5 pounds per day and 3.37 tons per year (TPY).

PE = PM10

See Section A.2.a.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1), OAC rule 3745-17-07(B)(1), OAC rule 3745-17-08(B) and OAC rule 3745-31-05(C).

Volatile organic compound (VOC) emissions shall not exceed 39.9 TPY for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 combined, based upon a rolling, 12-month summation

See Sections A.2.b and A.2.c.

See Section A.2.d.

See Section A.2.e

The permittee shall minimize or eliminate visible particulate emissions by the use of a cover and dust collector.

Exempt

The emission limitation specified by this rule is less stringent than the requirements of OAC rule 3745-31-05(A)(3).

Issued: To be entered upon final issuance

2. Additional Terms and Conditions

2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emissions limitations and use of a cover and dust collector.

2.b Paint production shall not result in an exceedance of the following emission limitations and /or control requirements:

The permittee shall emit no more than 39.9 tons of VOC per rolling, 12-month period based upon the monthly solvent input rates to emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 combined.

Monthly solvent input rate = $(A \times B \times C)/2000$ where A = the number of pounds of each paint mixed per month, B = the percent by weight of solvent of each paint mixed, and C = 0.015 (emission factor for amount of VOC emitted in lbs of VOC per lb of solvent in the paint).

The permittee has existing records to demonstrate compliance upon issuance of the permit.

2.c The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

2.d Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.

2.e Fugitive visible particulate emissions shall not exceed 20 percent opacity, as a three-minute average.

2.f The daily VOC and the daily and annual PE-PM10 emissions limitations outlined are based upon the emissions unit's Potential To Emit (PTE). Therefore, no records are required to demonstrate compliance with these limits.

B. Operational Restrictions

1. None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027:
 - a. The name and identification of each batch of paint produced.
 - b. The amount of each paint produced, in pounds.
 - c. The percent by weight VOC of each paint mixed.
 - d. The total combined monthly VOC emissions based upon the solvent input rate equation listed in term A.2.b, in tons per month.
 - e. The updated rolling, 12-month summation of VOC emissions based upon the solvent input rate equation listed in term A.2.b (the summation of the current month's emission total and the previous eleven calendar months emission totals).
 - f. The total combined monthly VOC emissions, in tons per month.
 - g. The updated rolling, 12-month summation of VOC emissions (the summation of the current month's emission total and the previous eleven calendar months emission totals).
2. The permittee shall collect and record the following information each month for determining the particulate matter emissions:
 - a. The name and identification of each batch of paint produced.
 - b. The total amount of solids used in the formulation of paints, in pounds.
 - c. The total monthly PM emissions, in tons per month.
3. The permittee shall collect and record the following information each month for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027:
 - a. The name and identification number of each batch of paint produced containing a HAP(s).
 - b. The number of pounds of each batch of paint produced.
 - c. The individual Hazardous Air Pollutant (HAP) content for each HAP per pound of paint produced in pounds of individual HAP per pound of paint.

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- d. The total combined HAP content of each paint in pounds of combined HAPs per pound of paint [sum all the individual HAP contents from (c)].
- e. The total individual HAP emissions for each HAP from all paints employed in pounds or tons per month [for each individual HAP, the summation of (b) x 1.5 percent x (c)].
- f. The total combined HAP emissions from all paints employed in pounds or tons per month [the summation of (b) x 1.5 percent x (d)].
- g. The updated rolling, 12-month summation for individual HAP emissions for each HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
- h. The updated rolling, 12-month summation for total combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.

- 4. The permit to install for this emissions unit (P016) 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: toluene

TLV (ug/m3): 188,400

Maximum Hourly Emission Rate (lbs/hr): 59.89

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 4318

MAGLC (ug/m3): 4486

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, 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(AAA)(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 (AAA)(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.);

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

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- 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 annual reports which specify the total organic compound emissions from emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027. These reports shall be submitted by January 30 of each year and cover the previous calendar year.
2. The permittee shall submit annual reports which specify the particulate matter emissions from this emissions units. These reports shall be submitted by January 30 of each year and cover the previous calendar year.
3. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the 12-month VOC emissions limitations listed in Sections A.1 and 2.b. If no deviations occurred during the reporting period, the permittee shall state so in the report.
4. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month HAPs emissions limitations in Section A.2.c. If no deviations occurred during the reporting period, the permittee shall state so in the report.
5. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emission limitations in Sections A.1 and 2 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

147.5 lbs/day of VOC.

Applicable Compliance Method:

The daily VOC emission rate is based on the emission unit's potential to emit. The potential to emit was calculated by: (maximum production rate in pounds per hour) x (the

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percent by weight VOC) x (emission factor of 1.5%).

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b. Emission Limitation:

18.5 lbs/day of PE-PM10.

Applicable Compliance Method:

The daily PE-PM10 emission rate is based on the emissions unit's potential to emit. The potential to emit was calculated by: (maximum production rate in pounds per hour) x (the percent by weight PM) x (emission factor of 1.0%).

c. Emission Limitation:

Volatile organic compound emissions based upon the solvent input rate equation listed in term A.2.b shall not exceed 39.9 TPY for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 combined, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the annual volatile organic compound emissions based upon the solvent input rate equation listed in term A.2.b shall be based upon the record keeping requirements as specified in Section C.1.

d. Emission Limitation:

Volatile organic compound (VOC) emissions shall not exceed 39.9 TPY for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 combined, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the annual volatile organic compound emission limitations in term A.1 shall be based upon the record keeping requirements as specified in Section C.1.

e. Emission Limitation:

3.37 TPY of PE-PM10.

Applicable Compliance Limitation:

Compliance with the annual particulate emission limitations in term A.1 shall be based

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upon the record keeping requirements as specified in Section C.2.

f. Emissions Limitations:

9.9 TPY for any single HAP and 24.9 TPY for combined HAPs

Applicable Compliance Method:

Compliance with the HAP emission limitations in term A.2.c will be determined by the record keeping requirements specified in Section C.3.

g. Emissions Limitations:

Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule.

Fugitive visible particulate emissions shall not exceed twenty percent (20%) opacity, as a three-minute average.

Applicable Compliance Method

Compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996.

F. Miscellaneous Requirements

1. The terms and conditions in this permit supersede Permit to Install 14-4437, as issued on January 28, 1998 and modified on January 3, 2002.
2. The following terms and conditions of this permit are federally enforceable: A, B, C.1 - C.3, D, and E.

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Emissions Unit ID: P017

Issued: To be entered upon final issuance

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>	
P017 - High Speed Dispersion Mixer 130 (modification)	OAC rule 3745-31-05(A)(3)	OAC rule 3745-17-07(A)(1)
		OAC rule 3745-17-07(B)(1)
		OAC rule 3745-17-08(B)
		OAC rule 3745-21-07(G)
		OAC rule 3745-17-11
		OAC rule 3745-31-05(C)

Applicable Emissions
Limitations/Control Measures

Volatile organic compound (VOC) emissions from the mixer shall not exceed 146.7 pounds per day.

Particulate emissions (PE) from the mixer shall not exceed 18.5 pounds per day and 3.37 tons per year (TPY).

PE = PM10

See Section A.2.a.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1), OAC rule 3745-17-07(B)(1), OAC rule 3745-17-08(B) and OAC rule 3745-31-05(C).

Volatile organic compound (VOC) emissions shall not exceed 39.9 TPY for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 combined, based upon a rolling, 12-month summation

See Sections A.2.b and A.2.c.

See Section A.2.d.

See Section A.2.e

The permittee shall minimize or

eliminate visible particulate emissions by the use of a cover and dust collector.

Exempt

The emission limitation specified by this rule is less stringent than the requirements of OAC rule 3745-31-05(A)(3).

Issued: To be entered upon final issuance

2. Additional Terms and Conditions

- 2.a** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emissions limitations and use of a cover and dust collector.
- 2.b** Paint production shall not result in an exceedance of the following emission limitations and /or control requirements:

The permittee shall emit no more than 39.9 tons of VOC per rolling, 12-month period based upon the monthly solvent input rates to emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 combined.

Monthly solvent input rate = $(A \times B \times C) / 2000$ where A = the number of pounds of each paint mixed per month, B = the percent by weight of solvent of each paint mixed, and C = 0.015 (emission factor for amount of VOC emitted in lbs of VOC per lb of solvent in the paint).

The permittee has existing records to demonstrate compliance upon issuance of the permit.

- 2.c** The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.
- 2.d** Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
- 2.e** Fugitive visible particulate emissions shall not exceed 20 percent opacity, as a three-minute average.
- 2.f** The daily VOC and the daily and annual PE-PM10 emissions limitations outlined are based upon the emissions unit's Potential To Emit (PTE). Therefore, no records are required to demonstrate compliance with these limits.

B. Operational Restrictions

- 1. None

Issued: To be entered upon final issuance

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027:
 - a. The name and identification of each batch of paint produced.
 - b. The amount of each paint produced, in pounds.
 - c. The percent by weight VOC of each paint mixed.
 - d. The total combined monthly VOC emissions based upon the solvent input rate equation listed in term A.2.b, in tons per month.
 - e. The updated rolling, 12-month summation of VOC emissions based upon the solvent input rate equation listed in term A.2.b (the summation of the current month's emission total and the previous eleven calendar months emission totals).
 - f. The total combined monthly VOC emissions, in tons per month.
 - g. The updated rolling, 12-month summation of VOC emissions (the summation of the current month's emission total and the previous eleven calendar months emission totals).
2. The permittee shall collect and record the following information each month for determining the particulate matter emissions:
 - a. The name and identification of each batch of paint produced.
 - b. The total amount of solids used in the formulation of paints, in pounds.
 - c. The total monthly PM emissions, in tons per month.
3. The permittee shall collect and record the following information each month for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027:
 - a. The name and identification number of each batch of paint produced containing a HAP(s).
 - b. The number of pounds of each batch of paint produced.
 - c. The individual Hazardous Air Pollutant (HAP) content for each HAP per pound of paint

produced in pounds of individual HAP per pound of paint.

- d. The total combined HAP content of each paint in pounds of combined HAPs per pound of paint [sum all the individual HAP contents from (c)].
- e. The total individual HAP emissions for each HAP from all paints employed in pounds or tons per month [for each individual HAP, the summation of (b) x 1.5 percent x (c)].
- f. The total combined HAP emissions from all paints employed in pounds or tons per month [the summation of (b) x 1.5 percent x (d)].
- g. The updated rolling, 12-month summation for individual HAP emissions for each HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
- h. The updated rolling, 12-month summation for total combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.

4. The permit to install for this emissions unit (P017) 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: toluene

TLV (ug/m3): 188,400

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Maximum Hourly Emission Rate (lbs/hr): 59.89

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 4318

MAGLC (ug/m3): 4486

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, 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(AAA)(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 (AAA)(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.);

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Issued

Facility ID: 1431480257

Emissions Unit ID: **P017**

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

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PTI A

Emissions Unit ID: P017

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- 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 annual reports which specify the total organic compound emissions from emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027. These reports shall be submitted by January 30 of each year and cover the previous calendar year.
2. The permittee shall submit annual reports which specify the particulate matter emissions from this emissions units. These reports shall be submitted by January 30 of each year and cover the previous calendar year.
3. The permittee shall submit deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the 12-month VOC emissions limitations listed in Sections A.1 and 2.b. If no deviations occurred during the reporting period, the permittee shall state so in the report.
4. The permittee shall submit deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month HAPs emissions limitations in Section A.2.c. If no deviations occurred during the reporting period, the permittee shall state so in the report.
5. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emission limitations in Sections A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

146.7 lbs/day of VOC

Applicable Compliance Method:

The daily VOC emission rate is based on the emission unit's potential to emit. The potential to emit was calculated by: (maximum production rate in pounds per hour) x (the percent by weight VOC) x (emission factor of 1.5%).

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b. Emission Limitation:

18.5 lbs/day of PE-PM10.

Applicable Compliance Method:

The daily PE-PM10 emission rate is based on the emissions unit's potential to emit. The potential to emit was calculated by: (maximum production rate in pounds per hour) x (the percent by weight PM) x (emission factor of 1.0%).

c. Emission Limitation:

Volatile organic compound emissions based upon the solvent input rate equation listed in term A.2.b shall not exceed 39.9 TPY for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 combined, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the annual volatile organic compound emissions based upon the solvent input rate equation listed in term A.2.b shall be based upon the record keeping requirements as specified in Section C.1.

d. Emission Limitation:

Volatile organic compound (VOC) emissions shall not exceed 39.9 TPY for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 combined, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the annual volatile organic compound emission limitations in term A.1 shall be based upon the record keeping requirements as specified in Section C.1.

e. Emission Limitation:

3.37 TPY of PE-PM10.

Applicable Compliance Limitation:

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PTI A

Emissions Unit ID: **P017**

Issued: To be entered upon final issuance

Compliance with the annual particulate emission limitations in term A.1 shall be based upon the record keeping requirements as specified in Section C.2.

f. Emissions Limitations:

9.9 TPY for any single HAP and 24.9 TPY for combined HAPs

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PTI A

Emissions Unit ID: **P017**

Issued: To be entered upon final issuance

Applicable Compliance Method:

Compliance with the HAP emission limitations in term A.2.c will be determined by the record keeping requirements specified in Section C.3.

g. Emissions Limitations:

Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule.

Fugitive visible particulate emissions shall not exceed twenty percent (20%) opacity, as a three-minute average.

Applicable Compliance Method

Compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996.

F. Miscellaneous Requirements

1. The terms and conditions in this permit supersede Permit to Install 14-4437, as issued on January 28, 1998 and modified on January 3, 2002.
2. The following terms and conditions of this permit are federally enforceable: A, B, C.1 - C.3, D, and E.

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P021 - Iraki Ring Mill 129 (modification)	OAC rule 3745-31-05(A)(3)	Volatile organic compound (VOC) emissions from the mill shall not exceed 213.3 pounds per day. See Section A.2.a.
	OAC rule 3745-31-05(C)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C). Volatile organic compound (VOC) emissions shall not exceed 39.9 TPY for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 combined, based upon a rolling, 12-month summation See Sections A.2.b and A.2.c.
	OAC rule 3745-21-07(G)(2)	Exempt.

2. Additional Terms and Conditions

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emissions limitations.

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- 2.b** Paint production shall not result in an exceedance of the following emission limitations and /or control requirements:

The permittee shall emit no more than 39.9 tons of VOC per rolling, 12-month period based upon the monthly solvent input rates to emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 combined.

Monthly solvent input rate = $(A \times B \times C)/2000$ where A = the number of pounds of each paint mixed/milled per month, B = the percent by weight of solvent of each paint mixed/milled, and C = 0.015 (emission factor for amount of VOC emitted in lbs of VOC per lb of solvent in the paint).

The permittee has existing records to demonstrate compliance upon issuance of the permit.

- 2.c** The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.
- 2.d** The daily VOC emissions limitation outlined is based upon the emissions unit's Potential To Emit (PTE). Therefore, no records are required to demonstrate compliance with this limit.

B. Operational Restrictions

1. None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027:
- a. The name and identification of each batch of paint produced.
 - b. The amount of each paint produced, in pounds.
 - c. The percent by weight VOC of each paint mixed/milled.

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- d. The total combined monthly VOC emissions based upon the solvent input rate equation listed in term A.2.b, in tons per month.
 - e. The updated rolling, 12-month summation of VOC emissions based upon the solvent input rate equation listed in term A.2.b (the summation of the current month's emission total and the previous eleven calendar months emission totals).
 - f. The total combined monthly VOC emissions, in tons per month.
 - g. The updated rolling, 12-month summation of VOC emissions (the summation of the current month's emission total and the previous eleven calendar months emission totals).
2. The permittee shall collect and record the following information each month for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027:
- a. The name and identification number of each batch of paint produced containing a HAP(s).
 - b. The number of pounds of each batch of paint produced.
 - c. The individual Hazardous Air Pollutant (HAP) content for each HAP per pound of paint produced in pounds of individual HAP per pound of paint.
 - d. The total combined HAP content of each paint in pounds of combined HAPs per pound of paint [sum all the individual HAP contents from (c)].
 - e. The total individual HAP emissions for each HAP from all paints employed in pounds or tons per month [for each individual HAP, the summation of (b) x 1.5 percent x (c)].
 - f. The total combined HAP emissions from all paints employed in pounds or tons per month [the summation of (b) x 1.5 percent x (d)].
 - g. The updated rolling, 12-month summation for individual HAP emissions for each HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
 - h. The updated rolling, 12-month summation for total combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by

contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.

3. The permit to install for this emissions unit (P021) 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).

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

Pollutant: toluene

TLV (ug/m3): 188,400

Maximum Hourly Emission Rate (lbs/hr): 59.89

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 4318

MAGLC (ug/m3): 4486

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, 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(AAA)(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 (AAA)(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 annual reports which specify the total organic compound emissions from emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027. These reports shall be submitted by January 30 of each year and cover the previous calendar year.
2. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the 12-month VOC emissions limitations listed in Sections A.1 and 2.b. If no deviations occurred during the reporting period, the permittee shall state so in the report.
3. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month HAPs emissions limitations in Section A.2.c. If no deviations occurred during the reporting period, the permittee shall state so in the report.
4. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emission limitations in Sections A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

213.3 lbs/day of VOC

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PTI A

Issued: To be entered upon final issuance

Emissions Unit ID: **P021**

Applicable Compliance Method:

The daily VOC emission rate is based on the emission unit's potential to emit. The potential to emit was calculated by: (maximum production rate in pounds per hour) x (the percent by weight VOC content of the paint) x (emission factor of 1.5%).

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PTI A

Emissions Unit ID: **P021**

Issued: To be entered upon final issuance

b. Emission Limitation:

Volatile organic compound emissions based upon the solvent input rate equation listed in term A.2.b shall not exceed 39.9 TPY for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 combined, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the annual volatile organic compound emission based upon the solvent input rate equation listed in term A.2.b shall be based upon the record keeping requirements as specified in Section C.1.

c. Emission Limitation:

Volatile organic compound (VOC) emissions shall not exceed 39.9 TPY for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 combined, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the annual volatile organic compound* input rate emission limitations in term A.1 shall be based upon the record keeping requirements as specified in Section C.1.

d.. Emissions Limitations:

9.9 TPY for any single HAP and 24.9 TPY for combined HAPs

Applicable Compliance Method:

Compliance with the HAP emission limitations in term A.2.c shall be determined by the record keeping requirements specified in Section C.2.

F. Miscellaneous Requirements

1. The terms and conditions in this permit supersede Permit to Install 14-04808, as issued on November 10, 1999.
2. The following terms and conditions of this permit are federally enforceable: A, B, C.1 and C.2, D, and E.

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P022 - Horizontal Media Mill 123 (modification)	OAC rule 3745-31-05(A)(3)	Volatile organic compound (VOC) emissions from the mill shall not exceed 4.0 pounds per day. See Section A.2.a.
	OAC rule 3745-31-05(C)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C). Volatile organic compound (VOC) emissions shall not exceed 39.9 TPY for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 combined, based upon a rolling, 12-month summation See Sections A.2.b and A.2.c.
	OAC rule 3745-21-07(G)(2)	Exempt.

2. Additional Terms and Conditions

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emissions limitations.

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- 2.b** Paint production shall not result in an exceedance of the following emission limitations and /or control requirements:

The permittee shall emit no more than 39.9 tons of VOC per rolling, 12-month period based upon the monthly solvent input rates to emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 combined.

Monthly solvent input rate = $(A \times B \times C)/2000$ where A = the number of pounds of each paint mixed/milled per month, B = the percent by weight of solvent of each paint mixed/milled, and C = 0.015 (emission factor for amount of VOC emitted in lbs of VOC per lb of solvent in the paint).

The permittee has existing records to demonstrate compliance upon issuance of the permit.

- 2.c** The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.
- 2.d** The daily VOC emissions limitation outlined is based upon the emissions unit's Potential To Emit (PTE). Therefore, no records are required to demonstrate compliance with this limit.

B. Operational Restrictions

- 1. None

C. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall collect and record the following information each month for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027:
 - a. The name and identification of each batch of paint produced.
 - b. The amount of each paint produced, in pounds.
 - c. The percent by weight VOC of each paint mixed/milled.

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PTI A

Emissions Unit ID: **P022**

Issued: To be entered upon final issuance

- d. The total combined monthly VOC emissions based upon the solvent input rate equation listed in term A.2.b, in tons per month.

- e. The updated rolling, 12-month summation of VOC emissions based upon the solvent input rate equation listed in term A.2.b (the summation of the current month's emission total and the previous eleven calendar months emission totals).

Issued: To be entered upon final issuance

- f. The total combined monthly VOC emissions, in tons per month.
 - g. The updated rolling, 12-month summation of VOC emissions (the summation of the current month's emission total and the previous eleven calendar months emission totals).
2. The permittee shall collect and record the following information each month for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027:
- a. The name and identification number of each batch of paint produced containing a HAP(s).
 - b. The number of pounds of each batch of paint produced.
 - c. The individual Hazardous Air Pollutant (HAP) content for each HAP per pound of paint produced in pounds of individual HAP per pound of paint.
 - d. The total combined HAP content of each paint in pounds of combined HAPs per pound of paint [sum all the individual HAP contents from (c)].
 - e. The total individual HAP emissions for each HAP from all paints employed in pounds or tons per month [for each individual HAP, the summation of (b) x 1.5 percent x (c)].
 - f. The total combined HAP emissions from all paints employed in pounds or tons per month [the summation of (b) x 1.5 percent x (d)].
 - g. The updated rolling, 12-month summation for individual HAP emissions for each HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
 - h. The updated rolling, 12-month summation for total combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.

3. The permit to install for this emissions unit (P022) 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

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unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

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

Pollutant: toluene

TLV (ug/m3): 188,400

Maximum Hourly Emission Rate (lbs/hr): 59.89

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 4318

MAGLC (ug/m3): 4486

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, 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

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3745-31-01(AAA)(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 (AAA)(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 annual reports which specify the total organic compound emissions from emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027. These reports shall be submitted by January 30 of each year and cover the previous calendar year.
2. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the 12-month VOC emissions limitations listed in Sections A.1 and 2.b. If no deviations occurred during the reporting period, the permittee shall state so in the report.
3. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month HAPs emissions limitations in Section A.2.c. If no deviations occurred during the reporting period, the permittee shall state so in the report.
4. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emission limitations in Sections A.1 and 2 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

4.0 lbs/day of VOC.

Applicable Compliance Method:

The daily VOC emission rate is based on the emission unit's potential to emit. The

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potential to emit was calculated by: (maximum production rate in pounds per hour) x (the percent by weight VOC content of the paint) x (emission factor of 1.5%).

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b. Emission Limitation:

Volatile organic compound emissions based upon the solvent input rate equation listed in term A.2.b shall not exceed 39.9 TPY for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 combined, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the annual volatile organic compound emissions based upon the solvent input rate equation listed in term A.2.b shall be based upon the record keeping requirements as specified in Section C.1.

c. Emission Limitation:

Volatile organic compound (VOC) emissions shall not exceed 39.9 TPY for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 combined, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the annual volatile organic compound emission limitations in term A.1 shall be based upon the record keeping requirements as specified in Section C.1.

d. Emissions Limitations:

9.9 TPY for any single HAP and 24.9 TPY for combined HAPs

Applicable Compliance Method:

Compliance with the HAP emission limitations in term A.2.c shall be determined by the record keeping requirements specified in Section C.2.

F. Miscellaneous Requirements

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

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Emissions Unit ID: P023

Issued: To be entered upon final issuance

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>
P023 - 50 Gallon Pebble Mill (modification)	OAC rule 3745-31-05(A)(3)	Volatile organic compound (VOC) emissions from the mill shall not exceed 9.0 pounds per day. See Section A.2.a.
	OAC rule 3745-31-05(C)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C). Volatile organic compound (VOC) emissions shall not exceed 39.9 TPY for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 combined, based upon a rolling, 12-month summation
	OAC rule 3745-21-07(G)(2)	See Sections A.2.b and A.2.c. Exempt

2. Additional Terms and Conditions

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emissions limitations.

- 2.b** Paint production shall not result in an exceedance of the following emission limitations and /or control requirements:

The permittee shall emit no more than 39.9 tons of VOC per rolling, 12-month period based upon the monthly solvent input rates to emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 combined.

Monthly solvent input rate = $(A \times B \times C)/2000$ where A = the number of pounds of each paint mixed/milled per month, B = the percent by weight of solvent of each paint mixed/milled, and C = 0.015 (emission factor for amount of VOC emitted in lbs of VOC per lb of solvent in the paint).

The permittee has existing records to demonstrate compliance upon issuance of the permit.

- 2.c** The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.
- 2.d** The daily VOC emissions limitation outlined is based upon the emissions unit's Potential To Emit (PTE). Therefore, no records are required to demonstrate compliance with this limit.

B. Operational Restrictions

1. None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027:
 - a. The name and identification of each batch of paint produced.
 - b. The amount of each paint produced, in pounds.
 - c. The percent by weight VOC of each paint mixed/milled.

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- d. The total combined monthly VOC emissions based upon the solvent input rate equation listed in term A.2.b, in tons per month.
 - e. The updated rolling, 12-month summation of VOC emissions based upon the solvent input rate equation listed in term A.2.b (the summation of the current month's emission total and the previous eleven calendar months emission totals).
 - f. The total combined monthly VOC emissions, in tons per month.
 - g. The updated rolling, 12-month summation of VOC emissions (the summation of the current month's emission total and the previous eleven calendar months emission totals).
2. The permittee shall collect and record the following information each month for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027:
- a. The name and identification number of each batch of paint produced containing a HAP(s).
 - b. The number of pounds of each batch of paint produced.
 - c. The individual Hazardous Air Pollutant (HAP) content for each HAP per pound of paint produced in pounds of individual HAP per pound of paint.
 - d. The total combined HAP content of each paint in pounds of combined HAPs per pound of paint [sum all the individual HAP contents from (c)].
 - e. The total individual HAP emissions for each HAP from all paints employed in pounds or tons per month [for each individual HAP, the summation of (b) x 1.5 percent x (c)].
 - f. The total combined HAP emissions from all paints employed in pounds or tons per month [the summation of (b) x 1.5 percent x (d)].
 - g. The updated rolling, 12-month summation for individual HAP emissions for each HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
 - h. The updated rolling, 12-month summation for total combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by

contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.

3. The permit to install for this emissions unit (P023) 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).

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

Pollutant: toluene

TLV (ug/m3): 188,400

Maximum Hourly Emission Rate (lbs/hr): 59.89

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 4318

MAGLC (ug/m3): 4486

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, 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(AAA)(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 (AAA)(1)(a)(ii)], then the permittee shall obtain a final permit

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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 annual reports which specify the total organic compound emissions from emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027. These reports shall be submitted by January 30 of each year and cover the previous calendar year.
2. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the 12-month VOC emissions limitations listed in Sections A.1 and 2.b. If no deviations occurred during the reporting period, the permittee shall state so in the report.
3. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month HAPs emissions limitations in Section A.2.c. If no deviations occurred during the reporting period, the permittee shall state so in the report.
4. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emission limitations in Sections A.1 and 2 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

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9.0 lbs/day of VOC.

Applicable Compliance Method:

The daily VOC emission rate is based on the emission unit's potential to emit. The potential to emit was calculated by: (maximum production rate in pounds per hour) x (the percent by weight VOC content of the paint) x (emission factor of 1.5%).

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Emissions Unit ID: **P023**

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b. Emission Limitation:

Volatile organic compound emissions based upon the solvent input rate equation listed in term A.2.b shall not exceed 39.9 TPY for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 combined, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the annual volatile organic compound emissions based upon the solvent input rate equation listed in term A.2.b shall be based upon the record keeping requirements as specified in Section C.1.

c. Emission Limitation:

Volatile organic compound (VOC) emissions shall not exceed 39.9 TPY for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 combined, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the annual volatile organic compound emission limitations in term A.1 shall be based upon the record keeping requirements as specified in Section C.1.

d. Emissions Limitations:

9.9 TPY for any single HAP and 24.9 TPY for combined HAPs

Applicable Compliance Method:

Compliance with the HAP emission limitations in term A.2.c shall be determined by the record keeping requirements specified in Section C.2.

F. Miscellaneous Requirements

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

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Emissions Unit ID: P024

Issued: To be entered upon final issuance

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>
P024 - 500 Gallon Pebble Mill 149 (modification)	OAC rule 3745-31-05(A)(3)	Volatile organic compound (VOC) emissions from the mill shall not exceed 88.8 pounds per day. See Section A.2.a.
	OAC rule 3745-31-05(C)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C). Volatile organic compound (VOC) emissions shall not exceed 39.9 TPY for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 combined, based upon a rolling, 12-month summation
	OAC rule 3745-21-07(G)(2)	See Sections A.2.b and A.2.c. Exempt

2. Additional Terms and Conditions

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emissions limitations.

- 2.b** Paint production shall not result in an exceedance of the following emission limitations and /or control requirements:

The permittee shall emit no more than 39.9 tons of VOC per rolling, 12-month period based upon the monthly solvent input rates to emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 combined.

Monthly solvent input rate = $(A \times B \times C)/2000$ where A = the number of pounds of each paint mixed/milled per month, B = the percent by weight of solvent of each paint mixed/milled, and C = 0.015 (emission factor for amount of VOC emitted in lbs of VOC per lb of solvent in the paint).

The permittee has existing records to demonstrate compliance upon issuance of the permit.

- 2.c** The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.
- 2.d** The daily VOC emissions limitation outlined is based upon the emissions unit's Potential To Emit (PTE). Therefore, no records are required to demonstrate compliance with this limit.

B. Operational Restrictions

1. None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027:
 - a. The name and identification of each batch of paint produced.
 - b. The amount of each paint produced, in pounds.
 - c. The percent by weight VOC of each paint mixed/milled.

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- d. The total combined monthly VOC emissions based upon the solvent input rate equation listed in term A.2.b, in tons per month.
 - e. The updated rolling, 12-month summation of VOC emissions based upon the solvent input rate equation listed in term A.2.b (the summation of the current month's emission total and the previous eleven calendar months emission totals).
 - f. The total combined monthly VOC emissions, in tons per month.
 - g. The updated rolling, 12-month summation of VOC emissions (the summation of the current month's emission total and the previous eleven calendar months emission totals).
2. The permittee shall collect and record the following information each month for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027:
- a. The name and identification number of each batch of paint produced containing a HAP(s).
 - b. The number of pounds of each batch of paint produced.
 - c. The individual Hazardous Air Pollutant (HAP) content for each HAP per pound of paint produced in pounds of individual HAP per pound of paint.
 - d. The total combined HAP content of each paint in pounds of combined HAPs per pound of paint [sum all the individual HAP contents from (c)].
 - e. The total individual HAP emissions for each HAP from all paints employed in pounds or tons per month [for each individual HAP, the summation of (b) x 1.5 percent x (c)].
 - f. The total combined HAP emissions from all paints employed in pounds or tons per month [the summation of (b) x 1.5 percent x (d)].
 - g. The updated rolling, 12-month summation for individual HAP emissions for each HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
 - h. The updated rolling, 12-month summation for total combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This

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Issued: To be entered upon final issuance

information does not have to be kept on a line-by-line basis.

3. The permit to install for this emissions unit (P024) 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: toluene

TLV (ug/m3): 188,400

Maximum Hourly Emission Rate (lbs/hr): 59.89

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 4318

MAGLC (ug/m3): 4486

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, 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(AAA)(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 (AAA)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.

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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 annual reports which specify the total organic compound emissions from emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027. These reports shall be submitted by January 30 of each year and cover the previous calendar year.
2. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the 12-month VOC emissions limitations listed in Sections A.1 and 2.b. If no deviations occurred during the reporting period, the permittee shall state so in the report.
3. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month HAPs emissions limitations in Section A.2.c. If no deviations occurred during the reporting period, the permittee shall state so in the report.
4. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emission limitations in Sections A.1 and 2 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

88.8 lbs/day of VOC.

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Applicable Compliance Method:

The daily VOC emission rate is based on the emission unit's potential to emit. The potential to emit was calculated by: (maximum production rate in pounds per hour) x (the percent by weight VOC content of the paint) x (emission factor of 1.5%).

b. Emission Limitation:

Volatile organic compound emissions based upon the solvent input rate equation listed in term A.2.b shall not exceed 39.9 TPY for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 combined, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the annual volatile organic compound emissions based upon the solvent input rate equation listed in term A.2.b shall be based upon the record keeping requirements as specified in Section C.1.

c. Emission Limitation:

Volatile organic compound (VOC) emissions shall not exceed 39.9 TPY for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 combined, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the annual volatile organic compound* input rate emission limitations in term A.1 shall be based upon the record keeping requirements as specified in Section C.1.

b. Emissions Limitations:

9.9 TPY for any single HAP and 24.9 TPY for combined HAPs

Applicable Compliance Method:

Compliance with the HAP emission limitations in term A.2.c shall be determined by the record keeping requirements specified in Section C.2.

F. Miscellaneous Requirements

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

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Emissions Unit ID: P025

Issued: To be entered upon final issuance

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>
P025 - Paint Process/Holding Tank 128 (modification)	OAC rule 3745-31-05(A)(3)	Volatile organic compound (VOC) emissions from this emissions unit shall not exceed 0.4 ton per year (TPY). See Section A.2.a.
	OAC rule 3745-31-05(C)	Volatile organic compound (VOC) emissions shall not exceed 39.9 TPY for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 combined, based upon a rolling, 12-month summation See Sections A.2.b and A.2.c.
	OAC rule 3745-21-07(G)	Exempt.

2. Additional Terms and Conditions

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emissions limitations and use of submerged fill.
- 2.b Paint usage shall not result in an exceedance of the following emission limitations and /or control requirements:

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The permittee shall emit no more than 39.9 tons of VOC per rolling, 12-month period based upon the monthly solvent input rates to emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 combined.

Monthly solvent input rate = $(A \times B \times C)/2000$ where A = the number of pounds of each paint mixed per month, B = the percent by weight of solvent of each paint mixed, and C = 0.015 (emission factor for amount of VOC emitted in lbs of VOC per lb of solvent in the paint).

The permittee has existing records to demonstrate compliance upon issuance of the permit.

- 2.c** The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 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.

B. Operational Restrictions

1. None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027:
 - a. The name and identification of each batch of paint produced.
 - b. The amount of each paint produced, in pounds.
 - c. The percent by weight VOC of each paint mixed.
 - d. The total combined monthly VOC emissions based upon the solvent input rate equation listed in term A.2.b, in tons per month.
 - e. The updated rolling, 12-month summation of VOC emissions based upon the solvent input rate equation listed in term A.2.b (the summation of the current month's emission total and the previous eleven calendar months emission totals).

- f. The total combined monthly VOC emissions, in tons per month.
 - g. The updated rolling, 12-month summation of VOC emissions (the summation of the current month's emission total and the previous eleven calendar months emission totals).
2. The permittee shall collect and record the following information each month for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027:

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- a. The name and identification number of each batch of paint produced containing a HAP(s).
- b. The number of pounds of each batch of paint produced.
- c. The individual Hazardous Air Pollutant (HAP) content for each HAP per pound of paint produced in pounds of individual HAP per pound of paint.
- d. The total combined HAP content of each paint in pounds of combined HAPs per pound of paint [sum all the individual HAP contents from (c)].
- e. The total individual HAP emissions for each HAP from all paints employed in pounds or tons per month [for each individual HAP, the summation of (b) x 1.5 percent x (c)].
- f. The total combined HAP emissions from all paints employed in pounds or tons per month [the summation of (b) x 1.5 percent x (d)].
- g. The updated rolling, 12-month summation for individual HAP emissions for each HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
- h. The updated rolling, 12-month summation for total combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.

D. Reporting Requirements

1. The permittee shall submit annual reports which specify the total organic compound emissions from emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027. These reports shall be submitted by January 30 of each year and cover the previous calendar year.
2. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the 12-month VOC emissions limitations listed in Sections A.1 and 2.b. If no deviations occurred during the reporting period, the permittee shall state so in the report.
3. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County

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Department of Environmental Services which identify all exceedances of the rolling, 12-month HAPs emissions limitations in Section A.2.c. If no deviations occurred during the reporting period, the permittee shall state so in the report.

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

E. Testing Requirements

1. Compliance with the emission limitations in Sections A.1 and 2 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

Volatile organic compound (VOC) emissions shall not exceed 0.4 TPY

Applicable Compliance Method:

Compliance with the annual volatile organic compound emissions limit is based upon the USEPA Tanks 4.0 program.

- b. Emission Limitation:

Volatile organic compound emissions based upon the solvent input rate equation listed in term A.2.b shall not exceed 39.9 TPY for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 combined, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the annual volatile organic compound emissions based upon the solvent input rate equation listed in term A.2.b shall be based upon the record keeping requirements as specified in Section C.1.

- c. Emission Limitation:

Volatile organic compound (VOC) emissions shall not exceed 39.9 TPY for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 combined, based upon a rolling, 12-month summation.

Applicable Compliance Method:

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Compliance with the annual volatile organic compound emission limitations in term A.1 shall be based upon the record keeping requirements as specified in Section C.1.

d. Emissions Limitations:

9.9 TPY for any single HAP and 24.9 TPY for combined HAPs

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Applicable Compliance Method:

Compliance with the HAP emission limitations in term A.2.c shall be determined by the record keeping requirements specified in Section C.2.

F. Miscellaneous Requirements

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

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P026 - Paint Process/Holding Tank 111 (modification)	OAC rule 3745-31-05(A)(3)	<p>Volatile organic compound (VOC) emissions from this emissions unit shall not exceed 0.3 ton per year (TPY).</p> <p>See Section A.2.a.</p>
	OAC rule 3745-31-05(C)	<p>Volatile organic compound (VOC) emissions shall not exceed 39.9 TPY for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 combined, based upon a rolling, 12-month summation</p> <p>See Sections A.2.b and A.2.c.</p>
	OAC rule 3745-21-07(G)	Exempt.

2. Additional Terms and Conditions

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with

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the emissions limitations and use of submerged fill.

- 2.b** Paint usage shall not result in an exceedance of the following emission limitations and /or control requirements:

The permittee shall emit no more than 39.9 tons of VOC per rolling, 12-month period based upon the monthly solvent input rates to emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 combined.

Monthly solvent input rate = $(A \times B \times C)/2000$ where A = the number of pounds of each paint mixed per month, B = the percent by weight of solvent of each paint mixed, and C = 0.015 (emission factor for amount of VOC emitted in lbs of VOC per lb of solvent in the paint).

The permittee has existing records to demonstrate compliance upon issuance of the permit.

- 2.c** The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 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.

B. Operational Restrictions

1. None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027:
- a. The name and identification of each batch of paint produced.
 - b. The amount of each paint produced, in pounds.
 - c. The percent by weight VOC of each paint mixed.
 - d. The total combined monthly VOC emissions based upon the solvent input rate equation listed in term A.2.b, in tons per month.

- e. The updated rolling, 12-month summation of VOC emissions based upon the solvent input rate equation listed in term A.2.b (the summation of the current month's emission total and the previous eleven calendar months emission totals).
 - f. The total combined monthly VOC emissions, in tons per month.
 - g. The updated rolling, 12-month summation of VOC emissions (the summation of the current month's emission total and the previous eleven calendar months emission totals).
2. The permittee shall collect and record the following information each month for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027:

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- a. The name and identification number of each batch of paint produced containing a HAP(s).
- b. The number of pounds of each batch of paint produced.
- c. The individual Hazardous Air Pollutant (HAP) content for each HAP per pound of paint produced in pounds of individual HAP per pound of paint.
- d. The total combined HAP content of each paint in pounds of combined HAPs per pound of paint [sum all the individual HAP contents from (c)].
- e. The total individual HAP emissions for each HAP from all paints employed in pounds or tons per month [for each individual HAP, the summation of (b) x 1.5 percent x (c)].
- f. The total combined HAP emissions from all paints employed in pounds or tons per month [the summation of (b) x 1.5 percent x (d)].
- g. The updated rolling, 12-month summation for individual HAP emissions for each HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
- h. The updated rolling, 12-month summation for total combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.

D. Reporting Requirements

1. The permittee shall submit annual reports which specify the total organic compound emissions from emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027. These reports shall be submitted by January 30 of each year and cover the previous calendar year.
2. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the 12-month VOC emissions limitations listed in Sections A.1 and 2.b. If no deviations occurred during the reporting period, the permittee shall state so in the report.

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3. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month HAPs emissions limitations in Section A.2.c. If no deviations occurred during the reporting period, the permittee shall state so in the report.
4. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emission limitations in Sections A.1 and 2 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

Volatile organic compound (VOC) emissions shall not exceed 0.3 TPY

Applicable Compliance Method:

Compliance with the annual volatile organic compound emissions limit is based upon the USEPA Tanks 4.0 program.
 - b. Emission Limitation:

Volatile organic compound emissions based upon the solvent input rate equation listed in term A.2.b shall not exceed 39.9 TPY for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 combined, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the annual volatile organic compound emissions based upon the solvent input rate equation listed in term A.2.b shall be based upon the record keeping requirements as specified in Section C.1.
 - c. Emission Limitation:

Volatile organic compound(VOC) emissions shall not exceed 39.9 TPY for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 combined, based upon a rolling, 12-month summation.

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Applicable Compliance Method:

Compliance with the annual volatile organic compound emission limitations in term A.1 shall be based upon the record keeping requirements as specified in Section C.1.

d. Emissions Limitations:

9.9 TPY for any single HAP and 24.9 TPY for combined HAPs

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Emissions Unit ID: **P026**

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Applicable Compliance Method:

Compliance with the HAP emission limitations in term A.2.c shall be determined by the record keeping requirements specified in Section C.2.

F. Miscellaneous Requirements

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

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Emissions Unit ID: P027

Issued: To be entered upon final issuance

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>	
P027 - High Speed Dispersion Mixer 132	OAC rule 3745-31-05(A)(3)	OAC rule 3745-17-07(A)(1)
		OAC rule 3745-17-07(B)(1)
		OAC rule 3745-17-08(B)
		OAC rule 3745-21-07(G)
		OAC rule 3745-17-11
	OAC rule 3745-31-05(C)	

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Applicable Emissions
Limitations/Control Measures

Volatile organic compound (VOC) emissions from the mixer shall not exceed 147.5 pounds per day.

Particulate emissions (PE) from the mixer shall not exceed 18.5 pounds per day and 3.37 TPY.

PE = PM10

See Section A.2.a.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1), OAC rule 3745-17-07(B)(1), OAC rule 3745-17-08(B) and OAC rule 3745-31-05(C).

Volatile organic compound (VOC) emissions shall not exceed 39.9 TPY for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 combined, based upon a rolling, 12-month summation

See Sections A.2.b and A.2.c.

See Section A.2.d.

See Section A.2.e

The permittee shall minimize or

eliminate visible particulate emissions by the use of a cover and dust collector.

Exempt

The emission limitation specified by this rule is less stringent than the requirements of OAC rule 3745-31-05(A)(3).

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2. Additional Terms and Conditions

2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emissions limitations and use of a cover and dust collector.

2.b Paint production shall not result in an exceedance of the following emission limitations and /or control requirements:

The permittee shall emit no more than 39.9 tons of VOC per rolling, 12-month period based upon the monthly VOC input rates to emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 combined.

Monthly VOC* input rate = $(A \times B \times C) / 2000$ where A = the number of pounds of each paint mixed per month, B = the percent by weight of solvent of each paint mixed, and C = 0.015 (emission factor for amount of VOC emitted in lbs of VOC per lb of solvent in the paint).

The permittee has existing records to demonstrate compliance upon issuance of the permit.

*This is based upon the premise that all solvents in the paint are emitted.

2.c The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

2.d Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.

2.e Fugitive visible particulate emissions shall not exceed 20 percent opacity, as a three-minute average.

2.f The daily VOC and the daily and annual PE-PM10 emissions limitations outlined are based upon the emissions unit's Potential To Emit (PTE). Therefore, no records are required to demonstrate compliance with these limits.

B. Operational Restrictions

1. None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027:
 - a. The name and identification of each batch of paint produced.
 - b. The amount of each paint produced, in pounds.
 - c. The percent by weight VOC of each paint mixed.
 - d. The total combined monthly VOC* input rate emissions, in tons per month.
 - e. The updated rolling, 12-month summation of VOC* input rate emissions (the summation of the current month's emission total and the previous eleven calendar months emission totals).
 - f. The total combined monthly VOC emissions, in tons per month.
 - g. The updated rolling, 12-month summation of VOC emissions (the summation of the current month's emission total and the previous eleven calendar months emission totals).
2. The permittee shall collect and record the following information each month for determining the particulate matter emissions:
 - a. The name and identification of each batch of paint produced.
 - b. The total amount of solids used in the formulation of paints, in pounds.
 - c. The total monthly PM emissions, in tons per month.
3. The permittee shall collect and record the following information each month for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027:
 - a. The name and identification number of each batch of paint produced containing a HAP(s).
 - b. The number of pounds of each batch of paint produced.

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- c. The individual Hazardous Air Pollutant (HAP) content for each HAP per pound of paint produced in pounds of individual HAP per pound of paint.
- d. The total combined HAP content of each paint in pounds of combined HAPs per pound of paint [sum all the individual HAP contents from (c)].
- e. The total individual HAP emissions for each HAP from all paints employed in pounds or tons per month [for each individual HAP, the summation of (b) x 1.5 percent x (c)].
- f. The total combined HAP emissions from all paints employed in pounds or tons per month [the summation of (b) x 1.5 percent x (d)].
- g. The updated rolling, 12-month summation for individual HAP emissions for each HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
- h. The updated rolling, 12-month summation for total combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.

- 4. The permit to install for this emissions unit (P021) 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).

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

Pollutant: toluene

TLV (ug/m3): 188,400

Maximum Hourly Emission Rate (lbs/hr): 59.89

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 4318

MAGLC (ug/m3): 4486

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, 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(AAA)(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 (AAA)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.

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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:"

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- 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 annual reports which specify the total organic compound emissions from emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027. These reports shall be submitted by January 30 of each year and cover the previous calendar year.
2. The permittee shall submit annual reports which specify the particulate matter emissions from this emissions units. These reports shall be submitted by January 30 of each year and cover the previous calendar year.
3. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the 12-month VOC emissions limitations listed in Sections A.1 and 2.b. If no deviations occurred during the reporting period, the permittee shall state so in the report.
4. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month HAPs emissions limitations in Section A.2.c. If no deviations occurred during the reporting period, the permittee shall state so in the report.
5. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emission limitations in Sections A.1 and 2 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

147.5 lbs/day of VOC.

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Applicable Compliance Method:

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The daily VOC emission rate is based on the emission unit's potential to emit. The potential to emit was calculated by: (maximum production rate in pounds per hour) x (the percent by weight VOC) x (emission factor of 1.5%).

b. Emission Limitation:

18.5 lbs/day of PE-PM10.

Applicable Compliance Method:

The daily PE-PM10 emission rate is based on the emissions unit's potential to emit. The potential to emit was calculated by: (maximum production rate in pounds per hour) x (the percent by weight PM) x (emission factor of 1.0%).

c. Emission Limitation:

Volatile organic compound* (VOC) input rate emissions shall not exceed 39.9 TPY for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 combined, based upon a rolling, 12-month summation

Applicable Compliance Method:

Compliance with the annual volatile organic compound* input rate emission limitations in term A.2.b shall be based upon the record keeping requirements as specified in Section C.1.

d. Emission Limitation:

Volatile organic compound (VOC) emissions shall not exceed 40 TPY for emissions units P001 - P008, P010 - P013, P016, P017 and P021 - P027 combined, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the annual volatile organic compound emission limitations in term A.1 shall be based upon the record keeping requirements as specified in Section C.1.

e. Emission Limitation:

3.37 TPY PE-PM10

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Emissions Unit ID: P027

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Applicable Compliance Limitation:

Compliance with the annual particulate emission limitations in term A.1 shall be based upon the record keeping requirements as specified in Section C.2.

f. Emissions Limitations:

9.9 TPY for any single HAP and 24.9 TPY for combined HAPs

Applicable Compliance Method:

Compliance with the HAP emission limitations in term A.2.c will be determined by the record keeping requirements specified in Section C.3.

g. Emissions Limitations:

Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule.

Fugitive visible particulate emissions shall not exceed twenty percent (20%) opacity, as a three-minute average.

Applicable Compliance Method

Compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996.

F. Miscellaneous Requirements

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