



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL MODIFICATION
WARREN COUNTY**

CERTIFIED MAIL

Street Address:

122 S. Front Street

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

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 14-04610

DATE: 8/12/2003

Gayston Corporation
Jay Heitz
PO Box 430 200 Pioneer Boulevard
Springboro, OH 45066

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, Ohio 43215

Sincerely,

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

CC: USEPA

HCDES



**Permit To Install
Terms and Conditions**

**Issue Date: 8/12/2003
Effective Date: 8/12/2003**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 14-04610

Application Number: 14-04610
APS Premise Number: 1483140304
Permit Fee: **\$200**
Name of Facility: Gayston Corporation
Person to Contact: Jay Heitz
Address: PO Box 430 200 Pioneer Boulevard
Springboro, OH 45066

Location of proposed air contaminant source(s) [emissions unit(s)]:
**200 Pioneer Boulevard
Springboro, Ohio**

Description of proposed emissions unit(s):
Modification of paint spray booth.

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

This permit is granted subject to the conditions attached hereto.


Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS**A. Permit to Install General Terms and Conditions****1. Compliance Requirements**

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

2. Reporting Requirements

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

Gayston Corporation

PTI Application: 14-04610

Modification Issued: 8/12/2003

Facility ID: 1483140304

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

a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter

Gayston Corporation
PTI Application: 14-04610
Modification Issued: 8/12/2003

Facility ID: 1483140304

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

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

14. Construction Compliance Certification

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

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	9.49

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K003 - Miscellaneous Metal Parts Coating Operation with Binks automatic electrostatic spray gun - Modification	OAC rule 3745-31-05(A)(3)	69.8 lbs VOC/day 9.49 TPY VOC
		See terms A.2.b, A.2.c, B.1 and B.2.
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(f)(ii) and OAC rule 3745-31-05(D).
	OAC rule 3745-31-05(D)	See terms A.2.d and A.2.e
	OAC rule 3745-21-09(U)(2)(f)(ii)	The requirements established pursuant to this rule are equivalent to 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 the emissions limitations, VOC content limitations, coating and cleanup material usage limitations and compliance with the Air Toxics Policy.
- 2.b The VOC content of all coatings employed in emissions unit K003 shall not exceed 4.8 pounds VOC per gallon of coating, excluding water and exempt solvents, as applied.

Modification Issued: 8/12/2003

- 2.c The VOC content of each cleanup material employed in emissions unit K003 shall not exceed 7.25 lbs VOC per gallon of cleanup material.
- 2.d The total allowable emissions of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be determined on a rolling, 12-month summation.
- 2.e The total allowable volatile organic compound (VOC) emissions from all coating and cleaning material located at this facility shall not exceed 24.9 TPY based on a rolling, 12-month summation. "Coating" means a protective, decorative, or functional material applied in a thin layer to a surface. Such materials include, but are not limited to, paints, topcoats, varnishes, sealers, stains, washcoats, base coats, inks and temporary protective coatings. "Cleaning material" means organic solvent used to remove coating materials from equipment used in the aerospace manufacturing and rework operations and associated cleaning operations.

B. Operational Restrictions

- 1. The maximum coating usage in emissions unit K003 shall not exceed 10 gallons per day and 3650 gallons per year, excluding water and exempt solvents.
- 2. The maximum cleaning material usage in emissions unit K003 shall not exceed 3 gallons per day and 200 gallons per year.

C. Monitoring and/or Record keeping Requirements

- 1. The permittee shall collect and record the following information each day for emissions unit K003:
 - a. The name and identification number of each coating and cleaning material employed.
 - b. The volume, in gallons, of each coating employed, excluding water and exempt solvents, as applied.
 - c. The VOC content of each coating (excluding water and exempt solvents), as applied, in pounds per gallon.
 - d. The volume, in gallons, of each cleaning material employed.

Modification Issued: 8/12/2003

- e. The VOC content of each cleaning material, in pounds per gallon.
- f. The total VOC emissions from all coatings and cleaning materials employed, in pounds [(b x c)+(d x e)].

The records shall be maintained for five years, and upon request the permittee shall submit such records to the appropriate Ohio EPA District Office or local air agency.

- 2. The permittee shall collect and record the following information each month for the entire facility:
 - a. The name and identification number of each coating, employed;
 - b. The individual Hazardous Air Pollutant (HAP) content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
 - c. The total combined HAP content of each coating in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (b)];
 - d. The number of gallons of each coating employed;
 - e. The name and identification of each cleaning material employed;
 - f. The individual HAP content for each HAP of each cleaning material in pounds of individual HAP per gallon of cleaning material, as applied;
 - g. The total combined HAP content of each cleaning material in pounds of combined HAPs per gallon of cleaning material, as applied [sum all the individual HAP contents from (f)];
 - h. The number of gallons of each cleaning material employed;
 - i. The total individual HAP emissions for each HAP from all coatings and cleaning materials employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each coating and the sum of (f) times (h) for each cleanup material];
 - j. The total combined HAP emissions from all coatings and cleaning materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material];
 - k. The updated rolling, 12-month summation for each individual HAP emissions, in pounds

Emissions Unit ID: **K003**

or tons. This shall include the information for the current month and the preceding eleven calendar months; and

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

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. This information does not have to be kept on a line-by-line basis.

3. The permittee shall collect and record the following information each month for emissions units K001, K002, and K003 for the purpose of demonstrating compliance with the annual VOC emission rate of 24.9 TPY VOC combined, based on a rolling, 12-month summation:
 - a. The name and identification number for each coating and cleaning material employed. "Coating" means a protective, decorative, or functional material applied in a thin layer to a surface. Such materials include, but are not limited to, paints, topcoats, varnishes, sealers, stains, washcoats, base coats, inks and temporary protective coatings. "Cleaning material" means organic solvent used to remove coating materials from equipment used in the aerospace manufacturing and rework operations and associated cleaning operations.
 - b. The volume, in gallons, of each coating and cleaning material employed, excluding water and exempt solvents.
 - c. The VOC content of each coating, excluding water and exempt solvents, and cleaning material, in pounds of VOC per gallon.
 - d. The amount of VOC emitted for all coating and cleaning materials employed, in pounds per month (b x c).
 - e. The rolling, 12-month* usage for coating and cleaning materials, in gallons, excluding water and exempt solvents.
 - f. The rolling, 12-month* VOC emission rate in tons per year (in tons, rounded off to one decimal place).

*A rolling, 12-month period includes the previous set of 12 months.

- g. Monthly records shall be completed within 15 days following the end of each calendar month and shall include the updated rolling, 12-month VOC emission rate.

The records shall be maintained for five years, and upon request the permittee shall submit such records to the appropriate Ohio EPA District Office or local air agency.

4. The permittee shall maintain for this facility all purchase orders and invoices of VOC-containing materials. The permittee shall retain such purchase orders and invoices for at least five years from the date of issuance. Upon request, the permittee shall make available to the Director of the Ohio EPA, or an authorized representative of the Director, such purchase orders and invoices for use in confirming the general accuracy of the records maintained and the reports submitted regarding material usage.
5. The permit to install for emissions unit K003 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emissions units 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 combined results of the modeling for the "worst case" pollutant(s) from K003:

Pollutant: xylene
TLV (ug/m^3): 434,000
Maximum Hourly Emission Rate (lbs/hr): 3.70
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m^3): 2112
MAGLC (ug/m^3): 10,333

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

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

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

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

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

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employs more than the applicable maximum coating and cleanup material usage limits and/or any exceedance of the VOC content limitations. The notification shall include a copy of such record and shall be sent to the

Modification Issued: 8/12/2003

Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.

2. The permittee shall also submit annual reports which specify the total VOC emissions and the annual coating and cleaning material usage from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year to the Hamilton County Department of Environmental Services.
3. If the facility (emissions units K001 - K003) has a rolling, 12 month record that exceeds 24.9 tons of VOC from combined operations associated with the coating and cleaning of aerospace parts, the permittee shall submit the following:
 - a. Within 30 days after the end of that rolling, 12-month period in which the exceedance occurred, a notification to the Hamilton County Department of Environmental Services that the VOC emission limit was exceeded .
 - b. Within three months after the end of that rolling, 12-month period in which the exceedance occurred, a compliance plan to the Hamilton County Department of Environmental Services to comply with the presumptive RACT standards specified within USEPA document EPA-453/R-97-004 " Control of Volatile Organic Compound Emissions from Aerospace Manufacturing and Rework Operations" (December 1997). Any divergence from the presumptive RACT standards and the model rule provided within that document shall be described at the time of the submittal of the 3-month compliance plan. Compliance with the presumptive RACT standards is to be achieved within 12 months after the rolling, 12-month period exceedance, unless otherwise requested by the permittee and approved by USEPA as a revision to Ohio's state implementation plan for ozone.
 - c. Exceeding the 24.9 TPY VOC limit is a violation for each day of the last month of each 12 month period in which the 24.9 TPY limit is exceeded , regardless of whether a compliance plan is submitted.
4. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP usage limitations set forth in this Permit to Install. The permittee shall submit annual reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Compliance with the VOC emissions limitations in section A.1. shall be demonstrated by the following equations:

Emissions limits

69.8 lbs VOC/day

9.49 TPY VOC

- a. $[\text{Coating usage (gal/day)} \times \text{VOC content (lbs VOC/gal)}] + [\text{Cleanup usage (gal/day)} \times \text{VOC content (lbs VOC/gal)}] = \text{lbs/day VOC};$
 - b. $\{[\text{Coating usage (gal/year)} \times \text{VOC content (lbs VOC/gal)}] + [\text{Cleanup usage (gal/year)} \times \text{VOC content (lbs VOC/gal)}]\} \times \text{Ton}/2000 \text{ lbs} = \text{TPY VOC};$
2. Compliance with the HAPs emissions limitations in term A.2.d of these terms and conditions shall be demonstrated by the record keeping requirements in term C.2. of these terms and conditions.
 3. Compliance with the operational restrictions in terms B.1 and B.2 of these terms and conditions shall be demonstrated by the record keeping requirement in term C.1. of these terms and conditions.
 4. OAC rule 3745-21-10(B) shall be used to determine the VOC contents of the coatings and cleaning materials employed in this emissions unit. If, pursuant to 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or cleaning material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for the coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

F. Miscellaneous Requirements

1. The terms and conditions of this permit to install shall supersede the terms and conditions of permit to install number 14-04610 issued on January 21, 1999.
2. The following terms and conditions are federally enforceable: A.2.a - A.2.e, B, C.1 - C.4, D and E.
3. This Federally Enforceable Permit limits the potential emissions of volatile organic compounds from the aerospace manufacturing and rework operations and associated cleaning operations located at this facility to no more than 24.9 TPY during any rolling, 12-month period. Should VOC emissions from the aerospace manufacturing and rework operations and associated cleaning

15

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PTI A

Modification Issued: 8/12/2003

Emissions Unit ID: **K003**

operations exceed 24.9 TPY during any rolling 12-month period, this facility should notify the Hamilton County Department of Environmental Services within 30 days. See term D.3.