

A. Applicable Emission Limitations and/or Control Requirements

1. The organic compound (OC) emissions from emissions unit R004 shall not exceed the following when coating metal parts:
 - a. 67 pounds per day and 12.2 tons per year from coatings.
 - b. 8 pounds per day and 1.5 tons per year from liquid organic cleanup material.
2. The organic compound (OC) emissions from emissions unit R004 shall not exceed the following when coating non-metal parts:
 - a. 8 pounds per hour, 40 pounds per day and 7.3 tons per year combined from coatings and liquid organic cleanup material.
3. The organic compound (OC) emissions from emissions unit R005 shall not exceed the following when coating metal parts:
 - a. 67 pounds per day and 12.2 tons per year from coatings.
 - b. 8 pounds per day and 1.5 tons per year from liquid organic cleanup material.
4. The organic compound (OC) emissions from emissions unit R005 shall not exceed the following when coating non-metal parts:
 - a. 8 pounds per hour, 40 pounds per day and 7.3 tons per year combined from coatings and liquid organic cleanup material.
5. The OC content of any coating employed in emissions unit R004 and/or R005 shall not exceed 6.7 pounds per gallon, as applied, including water and exempt solvents.

6. Visible particulate emissions from any stack associated with emissions units R004 and R005 shall not exceed 20% percent opacity, as a six-minute average, except as specified by rule.

B. Operational Restrictions

1. The coating usage in emissions units R004 and R005 shall not exceed 10 gallons per day for coating metal parts, for each emissions unit.

C. Monitoring and Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for emissions unit R004 when coating metal parts:
 - a. The name and identification number of each coating and liquid organic cleanup material employed.
 - b. The OC content of each coating and liquid organic cleanup material employed, in pounds per gallon, as applied, including water and exempt solvents.
 - c. The volume, in gallons, of each coating and liquid organic cleanup material employed for coating metal parts.
 - d. The total volume, in gallons, of all of the coatings employed for coating metal parts.
 - e. The daily OC emissions from coating metal parts, calculated by taking the sum of (b) times (c) for each coating employed for coating metal parts.
 - f. The daily OC emissions from coating metal parts, calculated by taking the sum of (b) times (c) for each liquid organic cleanup material employed for coating metal parts.
2. The permittee shall collect and record the following information each day for emissions unit R004 when coating non-metal parts:
 - a. The name and identification number of each coating and liquid organic cleanup material employed.

- b. The OC content of each coating and liquid organic cleanup material employed, in pounds per gallon, as applied, including water and exempt solvents.
 - c. The volume, in gallons, of each coating and liquid organic cleanup material employed for coating non-metal parts.
 - d. The daily OC emissions from coating non-metal parts, calculated by taking the sum of (b) times (c) for each coating and liquid organic cleanup material employed for coating non-metal parts.
 - e. The number of hours the emissions unit was in operation for coating non-metal parts.
 - f. The hourly OC emissions from coating non-metal parts, calculated by dividing (d) by (e) for each liquid organic cleanup material employed for coating metal parts.
3. The permittee shall collect and record the following information each day for emissions unit R005 when coating metal parts:
- a. The name and identification number of each coating and liquid organic cleanup material employed.
 - b. The OC content of each coating and liquid organic cleanup material employed, in pounds per gallon, as applied, including water and exempt solvents.
 - c. The volume, in gallons, of each coating and liquid organic cleanup material employed for coating metal parts.
 - d. The total volume, in gallons, of all of the coatings employed for coating metal parts.
 - e. The daily OC emissions from coating metal parts, calculated by taking the sum of (b) times (c) for each coating employed for coating metal parts.
 - f. The daily OC emissions from coating metal parts, calculated by taking the sum of (b) times (c) for

each liquid organic cleanup material employed for coating metal parts.

4. The permittee shall collect and record the following information each day for emissions unit R005 when coating non-metal parts:
 - a. The name and identification number of each coating and liquid organic cleanup material employed.
 - b. The OC content of each coating and liquid organic cleanup material employed, in pounds per gallon, as applied, including water and exempt solvents.
 - c. The volume, in gallons, of each coating and liquid organic cleanup material employed for coating non-metal parts.
 - d. The daily OC emissions from coating non-metal parts, calculated by taking the sum of (b) times (c) for each coating and liquid organic cleanup material employed for coating non-metal parts.
 - e. The number of hours the emissions unit was in operation for coating non-metal parts.
 - f. The hourly OC emissions from coating non-metal parts, calculated by dividing (d) by (e) for each liquid organic cleanup material employed for coating metal parts.
5. 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, unless otherwise specified in this permit. 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.

D. Reporting Requirements

1. The permittee shall submit required reports in the following manner:

CTL Aerospace, Inc.
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- 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 30, April 30, July 30, and October 30 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).

2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that emissions units R004 and/or R005 exceeded any usage, OC content and/or emissions limit for coating metal parts. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency).
3. The permittee shall submit deviation (excursion) reports for emissions units R004 and R005 which include the following information for coating non-metal parts:
 - a. An identification of each day during which the average hourly organic compound emissions from the coatings and cleanup materials employed for

coating non-metal parts exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for coating non-metal parts for each such day.

- b. An identification of each day during which the organic compound emissions from the coatings and reactive cleanup materials employed for coating non-metal parts exceeded 40 pounds per day, and the actual organic compound emissions for coating non-metal parts for each such day.
4. The permittee shall submit annual reports for emissions units R004 and R005 which include the following information for each of the emissions unit separately:
 - a. The annual OC emissions from all coatings and liquid organic cleanup materials employed for coating metal parts, in tons per year.
 - b. The annual OC emissions from all coatings and liquid organic cleanup materials employed for coating non-metal parts, in tons per year.

These reports shall be submitted by January 31 of each year and shall cover the previous calender year.

E. Compliance Methods/Testing Requirements

1. USEPA methods 24 and 24A shall be used to determine the VOC content for (a) coatings and (b) flexographic and rotogravure printing lines and related coatings, respectively. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.
2. Compliance with the usage and emissions limits shall be demonstrated by the record keeping requirements in Terms C.1, C.2, C.3 and C.4.

3. Compliance with the visible emissions limitation shall be determined by the methods outlined in Ohio Administrative Code (OAC) rule 3745-17-03(B)(1).

F. Miscellaneous Requirements

1. This permit allows the use of the coatings and cleanup materials specified by the permittee in the application for PTI number 14-4572. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the OC emission limitation(s) specified in this permit was (were) established in accordance with the Ohio EPA's "Air Toxics Policy" and is (are) based on both the coating and cleanup material formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application.

Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the Screen3 model and a comparison of the predicted 1 hour maximum ground-level concentration to the MAGLC. The following summarizes the results of the modeling for each pollutant:

Pollutant: 2-ethoxy ethanol (see attached toxic screening demonstration)

TLV (ug/m3): ~~313.51~~ 18,000
Maximum Hourly Emission Rate (lbs/hr): 3.27
Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 313.51
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 428.6

Any of the following changes may be deemed a "modification" to the emissions unit and, as such, prior notification to and approval from the appropriate Ohio EPA District Office or local air agency are required, including the possible issuance of modifications to PTI number 14-4572 and the operating permit:

- a. Any changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup 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 specified in the above table.

- b. Any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of any MAGLC specified in the above table.
- c. Any change to the emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01.
- ~~d. Any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in the emission of any of the exempted organic compounds included in the definition of "VOC" [OAC rule 3745-21-01(B)(6)].~~
- ~~e. Any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in an increase in emissions of any "Hazardous Air Pollutants" (HAPS) as defined in OAC rule 3745-77-01(V).~~

PERMIT REVIEW NARRATIVE
PTI 14-4572

CTL Aerospace, Inc.
5616 Spellmire Drive
Cincinnati, OH 45246

Premise Number: 1409000646

The permittee has submitted a PTI application for two new paint spray booths - Blowtherm Fabrication Booth (emissions unit R004) and Blowtherm Repair Booth (emissions unit R005). These two emissions units will be located at 9970 International Blvd. which is contiguous to 5616 Spellmire Drive. As the properties are contiguous, have same SIC code and have common ownership and control, they are considered one facility. CTL Aerospace, Inc. is currently a minor source for organic compound (OC) emissions and this PTI represents a minor modification to an existing minor facility.

The two paint spray booths will be used to paint aerospace components which will include both metal and non-metal parts. The applicable regulations are 3745-31-05, 3745-15-07, 3745-17-07, 3745-17-11, 3745-21-07(G) (2) and 3745-21-09(U) (2).

For emissions unit R004, the permit will limit OC emissions from coatings and cleanup materials employed for coating metal parts to 75 lbs/day and 13.7 TPY and OC emissions from coatings and cleanup materials employed for coating non-metal parts to 8 lbs/hr, 40 lbs/day and 7.3 TPY. For emissions unit R005, the permit will limit OC emissions from coatings and cleanup materials employed for coating metal parts to 75 lbs/day and 13.7 TPY and OC emissions from coatings and cleanup materials employed for coating non-metal parts to 8 lbs/hr, 40 lbs/day and 7.3 TPY. The facility currently is a synthetic minor for HAPs and has federally enforceable limitations limiting HAP emissions to less than the major source thresholds.

A final permit to install should be issued as the facility is in compliance with the applicable regulations. BAT is satisfied by usage and emission limitations and compliance with the air toxics policy.

The permit fee is:	R004	\$200.00	(based on a minimum PWR)
	R005	\$200.00	(based on a minimum PWR)
Total:		<u>\$400.00</u>	

Prepared By: Ajay Bahri
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