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Facility Name: **Phoenix Presentations Inc**

Application Number: **14-4612**

Date: **January 21, 1999**

### **GENERAL PERMIT CONDITIONS**

#### **TERMINATION OF PERMIT TO INSTALL**

Substantial construction for installation must take place within 18 months of the effective date of this permit. 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.

#### **NOTICE OF INSPECTION**

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

#### **CONSTRUCTION OF NEW SOURCES**

The proposed source(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed source(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 Ohio Administrative Code (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

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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 applicable standards.

### **PERMIT TO INSTALL FEE**

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

### **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.

### **APPLICABILITY**

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

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### **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.

### **PERMIT TO OPERATE APPLICATION**

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

### **SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION**

This facility is permitted to operate each source described by this permit to install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws and regulations.

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Phoenix Presentations Inc** located in **Butler** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

R004

Ohio  
EPA  
Source R002  
Number

R003

Source  
Identification  
Description

R001

Paint spray  
booth no. 1

R002  
Cont'd

R003  
Cont'd

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Ohio EPA Source <u>Number</u>	Source Identification <u>Number</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	Permit Allowable Mass Emissions and/or Control/Usage <u>Requirements</u>
	g operations			
Paint spray booth no. 2		<u>BAT Determination</u>  BAT is satisfied by use of HVLP guns, emission limits and compliance with Air Toxics Policy		BAT is satisfied by use of HVLP guns, emission limits and compliance with Air Toxics Policy
	Laminating area			BAT is satisfied by emission limits and compliance with Air Toxics Policy
Silk screeni ng and screen cleanin		BAT is satisfied by use of HVLP guns, emission limits and compliance with Air Toxics Policy		

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
	3745-21-09 (U) (2) (f) *	3745-17-07	(G) (2) *	Permit Allowable Mass Emissions and/or Control/Usage Requirements
Applicable Federal & OAC Rules	3745-15-07 3745-31-05			See General Terms
3745-15-07	3745-17-07	3745-17-11* 3745-21-07 (G) (2) *		0.551 pound PM-PM <sub>10</sub> hour 2.41 TPY PM-PM <sub>10</sub> See Terms A.1. and A.2. Visible particulate emissions limited to 20 percent opacity as a six-minute average, except as specified by rule
3745-31-05		3745-21-09 (U) (2) (f) *		Less stringent.
		3745-15-07		Less stringent.
3745-17-07	3745-17-11* 3745-21-07 (G) (2) *	3745-31-05 3745-17-07		Less stringent.
	3745-21-09 (U) (2) (f) *			Less stringent.
3745-17-11*	3745-15-07			Less stringent.
3745-21-07	3745-31-05			See General Terms
		3745-17-08*		
(G) (2) *		3745-21-07		0.551 pound PM-PM <sub>10</sub> hour

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
2.41 TPY PM-PM <sub>10</sub> See Terms A.1. and A.3. Visible particu late emissio ns limited to 20 percent opacity as a six-min ute average , except as specifi ed by rule  Less stringe nt.  Less stringe nt.  Less stringe nt.  Less stringe	nt.  See General Terms  0.551 pound PM-PM <sub>10</sub> hour 2.41 TPY PM-PM <sub>10</sub> See Terms A.1. and A.4. Visible particulate emissions limited to 20 percent opacity as a six-minute average, except as specified by rule  Less stringent.  Less stringent.  Less stringent.  See General Terms  0.551 pound	PM-PM <sub>10</sub> hour 2.41 TPY PM-PM <sub>10</sub> See Terms A.1. and A.5. Visible particulate emissions limited to 20 percent opacity as a three-minute average, except as specified by rule  Less stringent.  See OAC 3745-31-05.		

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\* The emission limitations established by this rule are less stringent than those established by Ohio Administrative Code (OAC) rule 3745-31-05(BAT).

#### SUMMARY

#### TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
Organic Compound	17.8
PM	9.64**
PM <sub>10</sub>	9.64**

\* Assume PM = PM<sub>10</sub>

#### REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Hamilton County Dept. of Env. Services, 1632 Central Parkway, Cincinnati, OH 45210.**

#### WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

#### MAINTENANCE OF EQUIPMENT

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This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

#### **MALFUNCTION/ABATEMENT**

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **Hamilton County Dept. of Env. Services, 1632 Central Parkway, Cincinnati, OH 45210.**

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

#### **AIR POLLUTION NUISANCES PROHIBITED**

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

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### **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.

### **ADDITIONAL SPECIAL TERMS AND CONDITIONS**

#### **A. Applicable Emission Limitations and/or Control Requirements**

1. The emissions of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from this facility shall be less than 10 TPY for any single HAP and 25 TPY for any combination of HAPs. Compliance with the above limitations shall be determined on a rolling, 12-month summation.
2.
  - a. The organic compound (OC) emissions from coatings and organic cleanup material employed for non-metal parts in emissions unit R001 shall not exceed 8 pounds per hour and 40 pounds per day.
  - b. The OC emissions from coatings and organic cleanup material employed for metal parts in emissions unit R001 shall not exceed 56.1 pounds per day.
  - c. The total OC emissions from coatings and organic cleanup material employed for both metal and non-metal parts in emissions unit R001 shall not exceed 4.5 TPY.
3.
  - a. The OC emissions from coatings and organic cleanup material employed for non-metal parts in emissions unit R002 shall not exceed 8 pounds per hour and 40 pounds per day.
  - b. The OC emissions from coatings and organic cleanup material employed for metal parts in emissions unit R002 shall not exceed 56.1 pounds per day.
  - c. The total OC emissions from coatings and organic cleanup material employed for both metal and non-metal parts in emissions unit R002 shall not exceed 4.5 TPY.

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4. a. The OC emissions from coatings and organic cleanup material employed for non-metal parts in emissions unit R003 shall not exceed 8 pounds per hour and 40 pounds per day.
  - b. The OC emissions from coatings and organic cleanup material employed for metal parts in emissions unit R003 shall not exceed 56.1 pounds per day.
  - c. The total OC emissions from coatings and organic cleanup material employed for both metal and non-metal parts in emissions unit R003 shall not exceed 1.5 TPY.
5. The OC emissions from emissions unit R004 shall not exceed 8 pounds per hour per and 40 pounds per day and 7.3 TPY.

**B. Operational Restrictions**

1. None.

**C. Monitoring and Recordkeeping Requirements**

1. The permittee shall collect and record the following information each month for the entire facility:
  - a. the name and identification number of each coating, as employed;
  - b. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
  - c. the total combined HAP content of each coating in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (b)];
  - d. the number of gallons of each coating employed;
  - e. the name and identification of each cleanup material employed;
  - f. the individual HAP content for each HAP of each

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cleanup material in pounds of individual HAP per gallon of cleanup material, as applied;

- g. the total combined HAP content of each cleanup material in pounds of combined HAPs per gallon of cleanup material, as applied [sum all the individual HAP contents from (f)];
- h. the number of gallons of each cleanup material employed;
- i. the total individual HAP emissions for each HAP from all coatings and cleanup 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 cleanup 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 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. For the first twelve months following the issuance of the permit, this shall be a cumulative total for all months since the issuance of the PTI; and,
- l. the updated rolling, 12-month summation for total combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months. For the first twelve months following the issuance of the permit, this shall be a cumulative total for all months since the issuance of the PTI.

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

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2. The permittee shall maintain the following daily records for all coatings and organic cleanup material employed for coating non-metal parts in each of the emissions units R001, R002 and R003 (these records shall be maintained separately for each of these emissions units):
  - a. the company identification for each coating and organic cleanup material employed;
  - b. documentation on whether or not each coating and organic cleanup material is a photochemically reactive material as defined in Ohio Administrative Code (OAC) rule 3745-21-01(C) (5);
  - c. the number of gallons of each coating and organic cleanup material employed;
  - d. the OC content of each coating and organic cleanup material, in pounds per gallon, as applied, including water and exempt solvents.
  - e. the total OC emission rate for all coating and organic cleanup material employed, in pounds per day (c X d);
  - f. the number of hours the emissions unit was in operation; and,
  - g. the average hourly total OC emission rate for all coating and organic cleanup material employed, in pounds per hour calculated by dividing (e) by (f).
  
3. The permittee shall maintain the following daily records for all coatings and organic cleanup material employed for coating metal parts in emissions unit R001, R002 and R003 (these records shall be maintained separately for each of these emissions units):
  - a. the company identification for each coating and organic cleanup material employed;
  - b. the number of gallons of each coating and organic cleanup material employed;
  - c. the OC content of each coating and organic cleanup material, in pounds per gallon, as applied, including water and exempt solvents; and,
  - d. the total OC emission rate for all coating and

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organic cleanup material employed, in pounds per day (b X c).

4. The permittee shall maintain the following daily records for emissions unit R004:
  - a. the company identification for each coating and organic cleanup material employed;

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- b. documentation on whether or not each coating and organic cleanup material is a photochemically reactive material as defined in Ohio Administrative Code (OAC) rule 3745-21-01(C) (5);
  - c. the number of gallons of each coating and organic cleanup material employed;
  - d. the OC content of each coating and organic cleanup material, in pounds per gallon, as applied, including water and exempt solvents;
  - e. the total OC emission rate for all coating and organic cleanup material employed, in pounds per day;
  - f. the number of hours the emissions unit was in operation; and,
  - g. the average hourly total OC emission rate for all coating and organic cleanup material employed, in pounds per hour calculated by dividing (e) by (f).
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. Support information shall include, but not 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 notify the Hamilton County Department of Environmental Services of any exceedance of the HAP emissions limitations set forth in this permit. The permittee shall submit annual reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year. If no exceedances occurred during the reporting period then a report is required stating so.

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2. The permittee shall submit deviation (excursion) reports which include the following information for each of the emissions units R001, R002 and R003:
  - a. an identification of each day during which a non-metal part was coated and the OC emissions from the coatings and organic cleanup material exceeded 40 pounds per day, and the actual OC emissions for each such day;
  - b. an identification of each day during which a non-metal part was coated and the average OC emissions from the coatings and organic cleanup material exceeded 8 pounds per hour, and the average OC emissions for each such day; and,
  - c. an identification of each day during which a metal part was coated and the OC emissions from the coatings and organic cleanup material exceeded 56.1 pounds per day, and the actual OC emissions for each such day.
3. The permittee shall submit semi-annual reports to the Hamilton County Dept. of Env. Services which summarize the following information for each of the emissions units R001, R002 and R003:

The monthly OC emissions for each month in the reporting period, in pounds or tons.

These reports shall be submitted by January 31 and July 31 of each year and shall cover the previous six calendar months ( July through December and January through June, respectively).
4. The permittee shall submit deviation (excursion) reports which include the following information for emissions unit R004:
  - a. an identification of each day during which the OC emissions from the coatings and organic cleanup material exceeded 40 pounds per day, and the actual OC emissions for each such day; and,
  - b. an identification of each day during which the average OC emissions from the coatings and organic cleanup material exceeded 8 pounds per hour, and the average OC emissions for each such day.
5. The permittee shall submit semi-annual reports to the

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Hamilton County Dept. of Env. Services which summarize  
the following information for emissions unit R004:

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The monthly OC emissions for each month in the reporting period, in pounds or tons.

These reports shall be submitted by January 31 and July 31 of each year and shall cover the previous six calendar months ( July through December and January through June, respectively).

6. 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 Hamilton County Dept. of Env. Services; and,
  - 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 Hamilton County Dept. of Env. Services. 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).

**E. Compliance Methods/Testing Requirements**

1. USEPA Methods 24 and 24A shall be used to determine the VOC contents for the coatings and cleanup materials employed in this emissions unit. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A,

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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 OC emissions limitations in Terms A.2, A.3, A.4 and A.5 shall be determined by the record keeping in Terms C.2, C.3 and C.4.
3. Compliance with the HAPs emissions limitations in Term A.1 shall be determined by the recordkeeping in Term C.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 14-4612. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the organic compounds 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: Toluene**

**TLV (ug/m3): 188,000**

**Maximum Hourly Emission Rate (lbs/hr):**

**= 8 lbs/hr from R001 + 8 lbs/hr from R002 + 8 lbs/hr from R003 + 8 lbs/hr from R004**

**Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 2095.4**

**Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 4476**

**Pollutant: Methylene chloride**

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**TLV (ug/m3): 174,000**

**Maximum Hourly Emission Rate (lbs/hr): = 8 lbs/hr from R004**

**Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 1299**

**Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 4143**

Any of the following changes may be deemed a "modification" to the emissions unit and, as such, prior notification to and approval from the Hamilton County Dept. of Env. Services are required, including the possible issuance of modifications to PTI number 14-4612 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; and,
- 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.