Facility Name: **Three Bond International Inc**
Application Number: **14-4664**
Date: **Draft PTI (Date will be entered upon final issuance)**

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

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.

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.

Facility Name: **Three Bond International Inc**
Application Number: **14-4664**
Date: **Draft PTI (Date will be entered upon final issuance)**

Facility Name: **Three Bond International Inc**
Application Number: **14-4664**
Date: **Draft PTI (Date will be entered upon final issuance)**

Ohio EPA Source Number	Source Identification Number	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
R001 (Mod)	R002 (Mod) Cont'd	R003 (Mod)	R004 (Mod)	R005 (Mod)
R006 (Mod)	R007 (Mod)	R007 (Mod) Cont'd	R008 (Mod)	

AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Three Bond International 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.

Facility Name: **Three Bond International Inc**
Application Number: **14-4664**
Date: **Draft PTI (Date will be entered upon final issuance)**

Ohio EPA Source Number	Source Identification Number	Source Identification Description	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
R009		Dip coating tank for metal and non-metal parts - Dip Tank No. 1	Dip coating tank for metal and non-metal parts - Dip Tank No. 3	Dip coating tank for metal and non-metal parts - Dip Tank No. 5	Dip coating tank for metal and non-metal parts - Dip Tank No. 7
R009 Cont'd		Dip coating tank for metal and non-metal parts - Dip Tank No. 2	Dip coating tank for metal and non-metal parts - Dip Tank No. 4	Dip coating tank for metal and non-metal parts - Dip Tank No. 6	Dip coating tank for metal and non-metal parts - Dip Tank No. 8

Facility Name: **Three Bond International Inc**
Application Number: **14-4664**
Date: **Draft PTI (Date will be entered upon final issuance)**

Ohio EPA Source Number	Source Identification Number	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
Dip coating tank for metal and non-metal parts - Dip Tank No. 9				

Facility Name: **Three Bond International Inc**
Application Number: **14-4664**
Date: **Draft PTI (Date will be entered upon final issuance)**

Ohio EPA Source Number	Source Identification Number	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
		and reporting requirements and compliance with air toxics policy	reporting requirements and compliance with air toxics policy	recordkeeping and reporting requirements and compliance with air toxics policy
	BAT Determination			
	BAT is satisfied by OC input and emission limits, compliance with recordkeeping and reporting requirements and compliance with air toxics policy	BAT is satisfied by OC input and emission limits, compliance with recordkeeping and reporting requirements and compliance with air toxics policy	BAT is satisfied by OC input and emission limits, compliance with recordkeeping and reporting requirements and compliance with air toxics policy	BAT is satisfied by OC input and emission limits, compliance with recordkeeping and reporting requirements and compliance with air toxics policy
	BAT is satisfied by OC input and emission limits, compliance with recordkeeping	BAT is satisfied by OC input and emission limits, compliance with recordkeeping and	BAT is satisfied by OC input and emission limits, compliance with	BAT is satisfied by OC input and emission limits, compliance with

Facility Name: **Three Bond International Inc**
Application Number: **14-4664**
Date: **Draft PTI (Date will be entered upon final issuance)**

Ohio EPA Source Number	Source Identification Number	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
recordkeeping and reporting requirements and compliance with air toxics policy	reporting requirements and compliance with air toxics policy			
BAT is satisfied by OC input and emission limits, compliance with recordkeeping and				

Facility Name: **Three Bond International Inc**
Application Number: **14-4664**
Date: **Draft PTI (Date will be entered upon final issuance)**

Ohio EPA Source Number	Source Identification Number	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
	Applicable Federal & OAC Rules			
	3745-15-07	3745-15-07	3745-15-07	3745-15-07
	3745-21-07 (G)(2)*	3745-21-07 (G)(2)*	3745-21-07 (G)(2)*	3745-21-07 (G)(2)*
	3745-21-09 (U)(2)(f)(ii)	3745-21-09 (U)(2)(f)(ii)	3745-21-09 (U)(2)(f)(ii)	3745-21-09 (U)(2)(f)(ii)
	3745-31-05	3745-31-05	3745-31-05	3745-31-05
	3745-15-07	3745-15-07	3745-15-07	3745-15-07
	3745-21-07 (G)(2)*	3745-21-07 (G)(2)*	3745-21-07 (G)(2)*	3745-21-07 (G)(2)*
	3745-21-09 (U)(2)(f)(ii)	3745-21-09 (U)(2)(f)(ii)	3745-21-09 (U)(2)(f)(ii)	3745-21-09 (U)(2)(f)(ii)
	3745-31-05	3745-31-05	3745-31-05	3745-31-05

Facility Name: **Three Bond International Inc**
Application Number: **14-4664**
Date: **Draft PTI (Date will be entered upon final issuance)**

Ohio EPA Source Number	Source Identification Number	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
3745-15-07				
3745-21-07 (G)(2)*				
3745-21-09 (U)(2)(f)(ii)				
3745-31-05				

Facility Name: **Three Bond International Inc**
Application Number: **14-4664**
Date: **Draft PTI (Date will be entered upon final issuance)**

Ohio EPA Source Number	Source Identification Number	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
			parts	
	Permit Allowable Mass Emissions and/or Control/Usage Requirements	3.85 pounds OC/hour when coating metal parts, 3.85 pounds OC/hour and 40 pounds OC/day when coating non-metal parts	See general terms	See general terms
			Less stringent	Less stringent
	See general terms	See general terms	Same as OAC rule 3745-31-05	Same as OAC rule 3745-31-05
	Less stringent	Less stringent	3.85 pounds OC/hour when coating metal parts, 3.85 pounds OC/hour and 40 pounds OC/day when coating non-metal parts	3.85 pounds OC/hour when coating metal parts, 3.85 pounds OC/hour and 40 pounds OC/day when coating non-metal parts
	Same as OAC rule 3745-31-05	Same as OAC rule 3745-31-05	See general terms	See general terms
	3.85 pounds OC/hour when coating metal parts, 3.85 pounds OC/hour and 40 pounds OC/day when coating non-metal parts	3.85 pounds OC/hour when coating metal parts, 3.85 pounds OC/hour and 40 pounds OC/day when coating non-metal parts	Less stringent	Less stringent
		See general terms	Same as OAC rule 3745-31-05	Same as OAC rule 3745-31-05
	See general terms	Less stringent	3.85 pounds OC/hour when coating metal parts, 3.85 pounds OC/hour and 40 pounds OC/day when coating non-metal parts	3.85 pounds OC/hour when coating metal parts, 3.85 pounds OC/hour and 40 pounds OC/day when coating non-metal parts
	Less stringent	Same as OAC rule 3745-31-05		
	Same as OAC rule 3745-31-05	3.85 pounds OC/hour when coating metal parts, 3.85 pounds OC/hour and 40 pounds OC/day when coating non-metal		

Facility Name: **Three Bond International Inc**
Application Number: **14-4664**
Date: **Draft PTI (Date will be entered upon final issuance)**

Ohio EPA Source Number	Source Identification Number	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
See general terms				
Less stringent				
Same as OAC rule 3745-31-05				
3.85 pounds OC/hour when coating metal parts, 3.85 pounds OC/hour and 40 pounds OC/day when coating non-metal parts				

* The emission limitations established by this rule is less stringent than those established by OAC rule 3745-31-05(BAT).

SUMMARY

Facility Name: **Three Bond International Inc**
Application Number: **14-4664**
Date: **Draft PTI (Date will be entered upon final issuance)**

Ohio EPA Source Number	Source Identification Number	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons/Year
Organic Compound	18.33

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Hamilton County Dept. of Env. Services, 250 William Howard Taft Road, Cincinnati, OH 45219-2660.**

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

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, 250 William Howard Taft Road, Cincinnati, OH 45219-2660.**

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.

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 based on a rolling, 12-month summation.

2. The OC emissions from emissions units R001 thru R009 shall not exceed 3.85 pounds per hour per emissions unit when coating metal or non-metal parts. This emissions limit is based on the maximum design capacity of the equipment.

3. The OC emissions from emissions units R001 thru R009 when coating non-metal parts shall not exceed 40 pounds per day per emissions unit.

4. Coating material usage shall not result in an exceedance of the following emission limitations and/or control requirements:

   The permittee shall not employ more than 18.33 tons of OC per rolling, 12-month period based upon the monthly OC input rate to emissions units R001 thru R009 combined.

   Monthly OC input rate = (sum of A x B for each coating and/or cleanup material employed) where A = the number of gallons of each coating and/or cleanup material employed per month and B = OC content of the coating and/or cleanup material in pounds per gallon. Monthly OC input rates are equivalent to monthly emissions rates and are based upon 100 percent of the solvent in the coating and/or cleanup materials being emitted.

B. <u>Operational Restrictions</u>

1. The organic compound (OC) content of any coating used in emissions units R001 thru R009 shall not exceed 7.7 pounds per gallon, as applied. The OC content of any cleanup material shall not exceed 12.2 pounds per gallon.

C. <u>Monitoring and Recordkeeping Requirements</u>

1. 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.

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 used;

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 organic cleanup material employed;

f. the individual HAP content for each HAP of each organic cleanup material in pounds of individual HAP per gallon of organic cleanup material, as applied;

g. the total combined HAP content of each organic cleanup material in pounds of combined HAPs per gallon of organic cleanup material, as applied [sum all the individual HAP contents from (f)];

h. the number of gallons of each organic cleanup material employed;

i. the total individual HAP emissions for each HAP from all coatings and organic 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 organic cleanup material];

j. the total combined HAP emissions from all coatings and organic 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 organic cleanup material];

k. the updated rolling twelve month total of the total individual HAP emissions for each HAP from all coating and cleanup material employed, in pounds or tons; and,

l. the updated rolling twelve month total of the total combined HAPs from all coating and cleanup

material employed, in pounds or tons.

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. On any day, during which a non-metal part is coated in any of the emissions units R001 thru R009, the permittee shall maintain the following daily records for each such emissions unit:

   a. the company identification for each coating and organic cleanup material employed for non-metal parts;

   b. documentation on whether or not each coating and 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 for coating non-metal parts;

   d. the OC content of each coating and organic cleanup material, in pounds per gallon, as applied for coating non-metal parts; and,

   e. the total OC emission rate for all coating and organic cleanup material used for coating non-metal parts, in pounds per day.

4. The permittee shall maintain monthly records for emissions units R001 thru R009 combined which contain the following information:

   a. the company identification for each coating and organic cleanup material employed;

   b. the number of gallons, as applied, of each coating and organic cleanup material employed for coating both metal and non-metal parts;

c. the OC content of each coating and organic cleanup material, in pounds per gallon, as applied;

d. the monthly OC input rate [emissions] [sum of (b) times (c) for each coating and organic cleanup material employed] in pounds or tons; and,

e. the updated rolling, 12-month total OC input rate [emissions] [sum of (d) for the current month and the preceding eleven calendar months].

5. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:

   a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and,

   b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

D. <u>Reporting Requirements</u>

1. 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).

2. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP emissions limitations set forth in Additional Special Term and Condition A.1. 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 30 of each year. If no exceedances occurred during the reporting period then a report is required stating so.

3. The permittee shall submit deviation (excursion) reports which include the following information for emissions units R001 thru R009:

   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; and,

   b. any exceedance of the OC content limitation for any coating or cleanup material.

4. The permittee shall submit deviation reports which identify all exceedances of the rolling, 12-month total OC input rate (emissions).

5. The permittee shall submit annual reports which specify the total OC emissions from emissions units R001-R009 for the previous calendar year. These reports shall be submitted by January 30 of each year.

E. <u>Compliance Methods/Testing Requirements</u>

1. Formulation data or USEPA method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the OC contents of the inks and coatings.

2. Compliance with the daily (lbs OC/day) and annual (tons OC/year) emission limitations will be determined by the recordkeeping requirements in Additional Special Term and Conditions C.3 and C.4 respectively.

3. Compliance with the HAP emission limitation shall be determined by the recordkeeping in Additional Special Term and Condition C.2.

4. Compliance with the OC content limitations shall be determined by the recordkeeping in Additional Special Terms and Conditions C.3 and C.4.

F. Miscellaneous Requirements

1. The following terms and conditions shall supersede all the air pollution control requirements for emissions units R001 thru R008 contained in the permit to install 14-4300 as issued on 10/22/97:

   Additional Special Terms and Conditions A thru F.

2. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (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): 3.12
   Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 4018
   MAGLC (ug/m3): 4476

   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 the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

   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 specified in the above table;

b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);

c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and,

d. 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.

3. The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;

b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and,

c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of

operation that either would 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, the permittee shall obtain a final permit to install prior to the change.