



State of Ohio Environmental Protection Agency

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P.O. Box 1049
Columbus, OH 43216-1049

12/4/2008

James Weaver
Cincinnati Milacron Afton Plant
4165 Halfacre Road
Batavia, OH 45103

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1413020004
Permit Number: P0103897
Permit Type: Renewal
County: Clermont

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR
No	CEMS
No	MACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate ("PTIO") which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully.

Ohio EPA maintains a document entitled "Frequently Asked Questions about the PTIO". The document can be downloaded from the DAPC Web page, www.epa.state.oh.us/dapc, from the "Permits" link. This document contains additional information related to your permit, such as what activities are covered under the PTIO, who has enforcement authority over the permit and Ohio EPA's authorization to inspect your facility and records. Please contact the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469 if you need assistance.

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission ("ERAC") under Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and describe the action complained of and the grounds for the appeal. The appeal must be filed with the ERAC within thirty (30) days after notice of the Director's action. A filing fee of \$70.00 must be submitted to the ERAC with the appeal, although the ERAC, has discretion to reduce the amount of the filing fee if you can demonstrate (by affidavit) that payment of the full amount of the fee would cause extreme hardship. If you file an appeal of this action, you must notify Ohio EPA of the filing of the appeal (by providing a copy to the Director) within three (3) days of filing your appeal with the ERAC. Ohio EPA requests that a copy of the appeal also be provided to the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the ERAC at the following address:

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

If you have any questions regarding this permit, please contact the Hamilton County Dept. of Environmental Services. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page www.epa.state.oh.us/dapc.

Sincerely,

Michael W. Ahern
Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: HCDOES

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director



**State of Ohio Environmental Protection Agency
Division of Air Pollution Control**

FINAL

**Air Pollution Permit-to-Install and Operate
for
Cincinnati Milacron Afton Plant**

Facility ID: 1413020004
Permit Number: P0103897
Permit Type: Renewal
Issued: 12/4/2008
Effective: 12/4/2008
Expiration: 12/4/2013



Air Pollution Permit-to-Install and Operate
for
Cincinnati Milacron Afton Plant

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Final Permit-to-Install and Operate
Permit Number: P0103897
Facility ID: 1413020004
Effective Date: 12/4/2008

Authorization

Facility ID: 1413020004
Application Number(s): A0035984
Permit Number: P0103897
Permit Description: This PTIO (FEPTIO) application has been submitted by the facility as a follow-up to the synthetic minor PTI, issued on Jan 02, 2007 which took the facility out of Title V status in terms of VOC and HAP emissions.
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 12/4/2008
Effective Date: 12/4/2008
Expiration Date: 12/4/2013
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Cincinnati Milacron Afton Plant
4165 Halfacre Road
Batavia, OH 45103

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Hamilton County Dept. of Environmental Services
250 William Howard Taft Pkwy.
Cincinnati, OH 45219-2660
(513)946-7777

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director



Authorization (continued)

Permit Number: P0103897
 Permit Description: This PTIO (FEPTIO) application has been submitted by the facility as a follow-up to the synthetic minor PTI, issued on Jan 02, 2007 which took the facility out of Title V status in terms of VOC and HAP emissions.

Permits for the following emissions unit(s) or groups of emissions units are in this document as indicated below:

- | | |
|-----------------------------------|------------------------------------|
| Emissions Unit ID: | K002 |
| Company Equipment ID: | Coating Line #2 |
| Superseded Permit Number: | |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | K005 |
| Company Equipment ID: | Coating Line #5 |
| Superseded Permit Number: | |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | K009 |
| Company Equipment ID: | Coating Line #9 |
| Superseded Permit Number: | |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | P001 |
| Company Equipment ID: | Wipe and Spray Cleaning Operations |
| Superseded Permit Number: | |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | P002 |
| Company Equipment ID: | Generator #1 |
| Superseded Permit Number: | |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | P003 |
| Company Equipment ID: | Generator # 2 |
| Superseded Permit Number: | |
| General Permit Category and Type: | Not Applicable |



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: P0103897

Facility ID: 1413020004

Effective Date: 12/4/2008

A. Standard Terms and Conditions



1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.



If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.



10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Hamilton County Dept. of Environmental Services in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

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change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: P0103897

Facility ID: 1413020004

Effective Date: 12/4/2008

B. Facility-Wide Terms and Conditions



1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) 2., 3., 4., and 5.

2. The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units K002 (Bay Area 1 Spray Booth), K005 (Bay Area 10 Spray Booth), K009 (Bay Area 5 Coating Line), P001 (Solvent Wipe and Spray Cleaning), P002 (Generator # 1), P003 (Generator # 2), other de minimus air contaminant sources, as defined in OAC rule 3745-15-05, and other air contaminant sources exempt from the requirement to obtain a permit to install pursuant to OAC rule 3745-31-03 installed subsequent to the issuance of this permit, combined, shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

The permittee has existing records of existing sources to demonstrate compliance with this limitation upon issuance of this permit.

3. The permittee shall collect and record the following information each month for the emissions units identified in 2. above:
 - 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 cleanup material employed;
 - f) The individual HAP content for each HAP of each 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 plus 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 of emissions for each individual HAP, in pounds 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 of emissions for total combined HAP, 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 Hamilton County Department of Environmental Services. This information does not have to be kept on an individual emissions unit basis.

4. The permittee shall submit quarterly deviation (excursion) reports which identify:

- a) Any exceedance of the rolling, 12-month HAP emission limitations outlined in 2. above;
- b) the probable cause of each deviation (excursion);
- c) any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d) the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by February 15, May 15, August 15, and November 15 of each year and shall cover the previous three calendar months (October through December, January through March, April through June and July through September, respectively).

5. Compliance with the emission limitations in B.2. of these terms and conditions shall be determined in accordance with the following method(s) identified below:

a) Emission Limitations:

Actual emissions of Hazardous Air Pollutants (HAPs) shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, as a 12-month rolling summation, as specified in 2. above.

Applicable Compliance Method:

Compliance with the 12-month rolling HAP limitations shall be demonstrated by the record keeping identified in 3. above.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: P0103897

Facility ID: 1413020004

Effective Date: 12/4/2008

C. Emissions Unit Terms and Conditions



1. K002, Coating Line #2

Operations, Property and/or Equipment Description:

Bay Area 1 Spray Booth

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - a. d)(2).
 - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - a. b)(1)c., b)(2)d., c)(1), c)(2), d)(1)g., d)(1)h., e)(3) and e)(4).
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Volatile Organic Compound (VOC) emissions shall not exceed 35.0 pounds per hour from coating usage only. See b)(2)c. The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(1)(c) and 3745-31-05(D).
b.	OAC rule 3745-21-09(U)(1)(c)	See b)(2)b.
c.	OAC rule 3745-31-05(D) Synthetic Minor for Hazardous Air Pollutants (HAPs) to Avoid NESHAP 40 CFR Part 63, Subpart M Synthetic Minor to Avoid Being a Major Source for VOC emissions.	See Section B.2., b)(2)d., c)(1) and c)(2).
d.	ORC 3704.03(F)(4)(c)	See d)(2).



(2) Additional Terms and Conditions

- a. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the VOC content, usage, and emission limitations.
- b. The VOC content, as applied, of each coating employed in this emissions unit shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.
- c. The VOC content of each cleanup material employed in this emissions unit shall not exceed 7.0 pounds of VOC per gallon of cleanup material, as applied.
- d. The volatile organic compound (VOC) emissions from emissions units K002 (Bay Area 1 Spray Booth), K005 (Bay Area 10 Spray Booth), and K009 (Bay Area 5 Coating Line) shall not exceed 57.93 tons per year based upon a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance with this emission limitation upon permit issuance.

- e. The hourly emission limitation outlined in term b)(1) is based upon the emissions unit's potential to emit. Therefore, no records are required to demonstrate compliance with this limitation.

c) Operational Restrictions

- (1) The maximum annual coating usage from emissions units K002 (Bay Area 1 Spray Booth), K005 (Bay Area 10 Spray Booth) and K009 (Bay Area 5 Coating Line) shall not exceed 12,500 gallons, excluding water and exempt solvents based upon a rolling, 12-month summation of the coating usage figures.
- (2) The maximum annual cleanup material usage from emissions units K002 (Bay Area 1 Spray Booth), K005 (Bay Area 10 Spray Booth) and K009 (Bay Area 5 Coating Line) shall not exceed 10,300 gallons, based upon a rolling, 12-month summation of the cleanup material usage figures.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for emissions units K002 (Bay Area 1 Spray Booth), K005 (Bay Area 10 Spray Booth) and K009 (Bay Area 5 Coating Line):
 - a. The name and identification number of each coating and cleanup material employed.
 - b. The VOC content for each coating, in pounds of VOC per gallon of coating, excluding water and exempt solvents.
 - c. The VOC content for each cleanup material, in pounds of VOC per gallon of cleanup material.
 - d. The number of gallons of each coating employed, excluding water and exempt solvents.



- e. The number of gallons of each cleanup material employed.
 - f. the total VOC emissions in pounds or tons [summation of (b. x d.) for all coatings plus (c. x e.) and divided by 2,000 pounds per ton if the units are in tons].
 - g. the updated rolling, 12-month summation of the coating and cleanup material usage, in gallons. This shall include the information for the current month and the preceding eleven calendar months.
 - h. The updated rolling, 12-month summation of the total VOC emissions, in tons. This shall include the information for the current month and the preceding eleven calendar months.
- (2) The permit to install and operate (PTIO) application for this/these emissions unit(s), (K002, K005 and K009) was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee in the permit application. The Toxic Air Contaminant Statute, ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled Review of New Sources of Air Toxic Emissions, Option A, as follows:
- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists= (ACGIH) Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists= (ACGIH) Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
 - b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
 - c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., X hours per day and Y days per week, from that of 8 hours per day and 5 days per week. The resulting



calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or worst case toxic contaminant(s):

Toxic contaminant: Toluene

TLV (mg/m3): 188,400

Maximum Hourly Emission rate (lbs/hr): 35.0 (emissions from K002)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1467 + 202 + 301 = 1970

MAGLC (ug/m3): 4,486

The permittee, has demonstrated that emissions of toluene from emissions unit K002 is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the Toxic Air Contaminant Statute, ORC 3704.03(F).

- (3) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
 - a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV 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 toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
 - c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the Toxic Air Contaminant Statute will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final permit to install and operate prior to the change. The Director may consider any significant departure from



the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

- (4) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the AToxic Air Contaminant Statute², ORC 3704.03(F):
 - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the AToxic Air Contaminant Statute², ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the AToxic Air Contaminant Statute², ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with the AToxic Air Contaminant Statute², ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.
 - (5) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the AToxic Air Contaminant Statute², ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.
 - (6) See Section B.3. of this permit.
- e) Reporting Requirements
- (1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the Director by the due date identified in the Authorization section of the permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
 - (2) The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of non-complying coatings and or cleanup materials (i.e., the VOC content limitations in b)(2)b. and b)(2)c.). The notification shall include a copy of such records and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.



- (3) The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month VOC emission limitation outlined in b)(2)d. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
- (4) The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month coating and cleanup material usage limitations outlined in c)(1) and c)(2). If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
- (5) The permittee shall submit annual reports to the appropriate Ohio EPA District Office or local air agency, documenting any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. If no changes to the emissions unit(s), emissions, or the exhaust stack have been made, then the report shall include a statement to this effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.
- (6) See Section B.4. of this permit.

f) Testing Requirements

(1) Emission Limitation:

Volatile organic compound emissions shall not exceed 35.0 pounds per hour.

Applicable Compliance Method:

Compliance shall be determined by multiplying the maximum coating usage of 10 gallons per hour by the maximum VOC content limit of 3.5 pounds of VOC per gallon.

(2) Emission Limitations:

The VOC content, as applied, of each coating employed in this emissions unit shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.

The VOC content of each cleanup material employed in this emissions unit shall not exceed 7.0 pounds of VOC per gallon of cleanup material, as applied.

Applicable Compliance Method:

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 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.

- (3) Compliance with the VOC emission limitation specified in b)(2)d. shall be determined by the required record keeping in d)(1).
 - (4) Compliance with the coating and cleanup material usage limitations as specified in c)(1) and c)(2) shall be determined by the required record keeping in d)(1).
- g) Miscellaneous Requirements
- (1) None.



2. K005, Coating Line #5

Operations, Property and/or Equipment Description:

Bay Area 10 Spray Booth

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - a. d)(2).
 - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - a. b)(1)c., b)(2)d., c)(1), c)(2), d)(1)g., d)(1)h., e)(3) and e)(4).
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	<p>Volatile Organic Compound (VOC) emissions shall not exceed 35.0 pounds per hour from coating usage only.</p> <p>See b)(2)c.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(1)(c) and 3745-31-05(D).</p>
b.	OAC rule 3745-21-09(U)(1)(c)	See b)(2)b.
c.	<p>OAC rule 3745-31-05(D)</p> <p>Synthetic Minor for Hazardous Air Pollutants (HAPs) to Avoid NESHAP 40 CFR Part 63, Subpart M</p> <p>Synthetic Minor to Avoid Being a Major Source for VOC emissions.</p>	See Section B.2., b)(2)d., c)(1) and c)(2).
d.	ORC 3704.03(F)(4)(c)	See d)(2).



(2) Additional Terms and Conditions

- a. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the VOC content, usage, and emission limitations.
- b. The VOC content, as applied, of each coating employed in this emissions unit shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.
- c. The VOC content of each cleanup material employed in this emissions unit shall not exceed 7.0 pounds of VOC per gallon of cleanup material, as applied.
- d. The volatile organic compound (VOC) emissions from emissions units K002 (Bay Area 1 Spray Booth), K005 (Bay Area 10 Spray Booth), and K009 (Bay Area 5 Coating Line) shall not exceed 57.93 tons per year based upon a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance with this emission limitation upon permit issuance.

- e. The hourly emission limitation outlined in term b)(1) is based upon the emissions unit's potential to emit. Therefore, no records are required to demonstrate compliance with this limitation.

c) Operational Restrictions

- (1) The maximum annual coating usage from emissions units K002 (Bay Area 1 Spray Booth), K005 (Bay Area 10 Spray Booth) and K009 (Bay Area 5 Coating Line) shall not exceed 12,500 gallons, excluding water and exempt solvents based upon a rolling, 12-month summation of the coating usage figures.
- (2) The maximum annual cleanup material usage from emissions units K002 (Bay Area 1 Spray Booth), K005 (Bay Area 10 Spray Booth) and K009 (Bay Area 5 Coating Line) shall not exceed 10,300 gallons, based upon a rolling, 12-month summation of the cleanup material usage figures.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for emissions units K002 (Bay Area 1 Spray Booth), K005 (Bay Area 10 Spray Booth) and K009 (Bay Area 5 Coating Line):
 - a. The name and identification number of each coating and cleanup material employed.
 - b. The VOC content for each coating, in pounds of VOC per gallon of coating, excluding water and exempt solvents.
 - c. The VOC content for each cleanup material, in pounds of VOC per gallon of cleanup material.



- d. The number of gallons of each coating employed, excluding water and exempt solvents.
 - e. The number of gallons of each cleanup material employed.
 - f. the total VOC emissions in pounds or tons [summation of (b. x d.) for all coatings plus (c. x e.) and divided by 2,000 pounds per ton if the units are in tons].
 - g. the updated rolling, 12-month summation of the coating and cleanup material usage, in gallons. This shall include the information for the current month and the preceding eleven calendar months.
 - h. The updated rolling, 12-month summation of the total VOC emissions, in tons. This shall include the information for the current month and the preceding eleven calendar months.
- (2) The permit to install and operate (PTIO) application for this/these emissions unit(s), (K002, K005 and K009) was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee in the permit application. The Toxic Air Contaminant Statute, ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled Review of New Sources of Air Toxic Emissions, Option A, as follows:
- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists= (ACGIH) Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists= (ACGIH) Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
 - b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
 - c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., X hours per day and Y



days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or worst case toxic contaminant(s):

Toxic Contaminant: Toluene

TLV (mg/m³): 188,400

Maximum Hourly Emission Rate (lbs/hr): 35.0 (emissions unit K005)

Predicted 1-Hour Maximum Ground Level Concentration (ug/m³): 1467 + 202 + 301 = 1970

MAGLC (ug/m³): 4,486

The permittee, has demonstrated that emissions of toluene from emissions unit K002 is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the Toxic Air Contaminant Statute, ORC 3704.03(F).

- (3) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
 - a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV 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 toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
 - c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the Toxic Air Contaminant Statute will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final permit to install and



operate prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

- (4) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the AToxic Air Contaminant Statute², ORC 3704.03(F):
 - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the AToxic Air Contaminant Statute², ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the AToxic Air Contaminant Statute², ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with the AToxic Air Contaminant Statute², ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.
 - (5) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the AToxic Air Contaminant Statute², ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.
 - (6) See Section B.3. of this permit.
- e) Reporting Requirements
- (1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the Director by the due date identified in the Authorization section of the permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
 - (2) The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of non-complying coatings and or cleanup materials (i.e., the VOC content limitations in b)(2)b. and b)(2)c.). The notification shall



include a copy of such records and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.

- (3) The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month VOC emission limitation outlined in b)(2)d. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
- (4) The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month coating and cleanup material usage limitations outlined in c)(1) and c)(2). If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
- (5) The permittee shall submit annual reports to the appropriate Ohio EPA District Office or local air agency, documenting any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. If no changes to the emissions unit(s), emissions, or the exhaust stack have been made, then the report shall include a statement to this effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.
- (6) See Section B.4. of this permit.

f) Testing Requirements

(1) Emission Limitation:

Volatile organic compound emissions shall not exceed 35.0 pounds per hour.

Applicable Compliance Method:

Compliance shall be determined by multiplying the maximum coating usage of 10 gallons per hour by the maximum VOC content limit of 3.5 pounds of VOC per gallon.

(2) Emission Limitations:

The VOC content, as applied, of each coating employed in this emissions unit shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.

The VOC content of each cleanup material employed in this emissions unit shall not exceed 7.0 pounds of VOC per gallon of cleanup material, as applied.

Applicable Compliance Method:



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 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.

- (3) Compliance with the VOC emission limitation specified in b)(2)d. shall be determined by the required record keeping in d)(1).
 - (4) Compliance with the coating and cleanup material usage limitations as specified in c)(1) and c)(2) shall be determined by the required record keeping in d)(1).
- g) Miscellaneous Requirements
- (1) None.



3. K009, Coating Line #9

Operations, Property and/or Equipment Description:

Bay Area 5 Coating Line

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - a. d)(2).
 - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - a. b)(1)c., b)(2)d., c)(1), c)(2), d)(1)g., d)(1)h., e)(3) and e)(4).
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a..	OAC rule 3745-31-05(A)(3)	<p>Volatile Organic Compound (VOC) emissions shall not exceed 35.0 pounds per hour from coating usage only.</p> <p>See b)(2)c.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(1)(c) and 3745-31-05(D).</p>
b.	OAC rule 3745-21-09(U)(1)(c)	See b)(2)b.
c.	<p>OAC rule 3745-31-05(D)</p> <p>Synthetic Minor for Hazardous Air Pollutants (HAPs) to Avoid NESHAP 40 CFR Part 63, Subpart M</p>	See Section B.2., b)(2)d., c)(1) and c)(2).



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	Synthetic Minor to Avoid Being a Major Source for VOC emissions.	
d.	ORC 3704.03(F)(4)(c)	See d)(2).

(2) Additional Terms and Conditions

- a. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the VOC content, usage, and emission limitations.
- b. The VOC content, as applied, of each coating employed in this emissions unit shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.
- c. The VOC content of each cleanup material employed in this emissions unit shall not exceed 7.0 pounds of VOC per gallon of cleanup material, as applied.
- d. The volatile organic compound (VOC) emissions from emissions units K002 (Bay Area 1 Spray Booth), K005 (Bay Area 10 Spray Booth), and K009 (Bay Area 5 Coating Line) shall not exceed 57.93 tons per year based upon a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance with this emission limitation upon permit issuance.
- e. The hourly emission limitation outlined in term b)(1) is based upon the emissions unit's potential to emit. Therefore, no records are required to demonstrate compliance with this limitation.

c) Operational Restrictions

- (1) The maximum annual coating usage from emissions units K002 (Bay Area 1 Spray Booth), K005 (Bay Area 10 Spray Booth) and K009 (Bay Area 5 Coating Line) shall not exceed 12,500 gallons, excluding water and exempt solvents based upon a rolling, 12-month summation of the coating usage figures.
- (2) The maximum annual cleanup material usage from emissions units K002 (Bay Area 1 Spray Booth), K005 (Bay Area 10 Spray Booth) and K009 (Bay Area 5 Coating Line) shall not exceed 10,300 gallons, based upon a rolling, 12-month summation of the cleanup material usage figures.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for emissions units K002 (Bay Area 1 Spray Booth), K005 (Bay Area 10 Spray Booth) and K009 (Bay Area 5 Coating Line):
 - a. The name and identification number of each coating and cleanup material employed.



- b. The VOC content for each coating, in pounds of VOC per gallon of coating, excluding water and exempt solvents.
 - c. The VOC content for each cleanup material, in pounds of VOC per gallon of cleanup material.
 - d. The number of gallons of each coating employed, excluding water and exempt solvents.
 - e. The number of gallons of each cleanup material employed.
 - f. the total VOC emissions in pounds or tons [summation of (b. x d.) for all coatings plus (c. x e.) and divided by 2,000 pounds per ton if the units are in tons].
 - g. the updated rolling, 12-month summation of the coating and cleanup material usage, in gallons. This shall include the information for the current month and the preceding eleven calendar months.
 - h. The updated rolling, 12-month summation of the total VOC emissions, in tons. This shall include the information for the current month and the preceding eleven calendar months.
- (2) The permit to install and operate (PTIO) application for this/these emissions unit(s), (K002, K005 and K009) was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee in the permit application. The Toxic Air Contaminant Statute, ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled Review of New Sources of Air Toxic Emissions, Option A, as follows:
- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists= (ACGIH) Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists= (ACGIH) Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.



- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., ΔX hours per day and ΔY days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$\text{TLV}/10 \times 8/X \times 5/Y = 4 \text{ TLV}/XY = \text{MAGLC}$$

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or Δ worst case toxic contaminant(s):

Toxic Contaminant: Toluene

TLV (mg/m³): 188,400

Maximum Hourly Emission Rate (lbs/hr): 35.0 (emissions unit K009)

Predicted 1-Hour Maximum Ground Level Concentration (ug/m³): 1467 + 202 + 301 = 1970

MAGLC (ug/m³): 4,486

The permittee, has demonstrated that emissions of toluene from emissions unit K002 is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the Δ Toxic Air Contaminant Statute, ORC 3704.03(F).

- (3) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
 - a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV 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 toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
 - c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).



If the permittee determines that the AToxic Air Contaminant Statute will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the AToxic Air Contaminant Statute, ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final permit to install and operate prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

- (4) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the AToxic Air Contaminant Statute, ORC 3704.03(F):
 - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the AToxic Air Contaminant Statute, ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the AToxic Air Contaminant Statute, ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with the AToxic Air Contaminant Statute, ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.
 - (5) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the AToxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.
 - (6) See Section B.3. of this permit.
- e) Reporting Requirements
- (1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the Director by the due date identified in the Authorization section of the permit. The permit evaluation report shall



cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

- (2) The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of non-complying coatings and or cleanup materials (i.e., the VOC content limitations in b)(2)b. and b)(2)c.). The notification shall include a copy of such records and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.
- (3) The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month VOC emissions limitation outlined in b)(2)d. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
- (4) The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month coating and cleanup material usage limitations outlined in c)(1) and c)(2). If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
- (5) The permittee shall submit annual reports to the appropriate Ohio EPA District Office or local air agency, documenting any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. If no changes to the emissions unit(s), emissions, or the exhaust stack have been made, then the report shall include a statement to this effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.
- (6) See Section B.4. of this permit.

f) Testing Requirements

(1) Emission Limitation:

Volatile organic compound emissions shall not exceed 35.0 pounds per hour.

Applicable Compliance Method:

Compliance shall be determined by multiplying the maximum coating usage of 10 gallons per hour by the maximum VOC content limit of 3.5 pounds of VOC per gallon.

(2) Emission Limitations:

The VOC content, as applied, of each coating employed in this emissions unit shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.



The VOC content of each cleanup material employed in this emissions unit shall not exceed 7.0 pounds of VOC per gallon of cleanup material, as applied.

Applicable Compliance Method:

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 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.

- (3) Compliance with the VOC emission limitation specified in b)(2)d. shall be determined by the required record keeping in d)(1).
- (4) Compliance with the coating and cleanup material usage limitations as specified in c)(1) and c)(2) shall be determined by the required record keeping in d)(1).

g) Miscellaneous Requirements

- (1) None.



4. P001, Wipe and Spray Cleaning Operations

Operations, Property and/or Equipment Description:

Solvent Wipe and Spray Cleaning

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - a. d)(2).
 - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - a. b)(1)b., b)(2)b., c)(1), d)(1)e., d)(1)f., e)(3) and e)(4).
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	<p>Volatile Organic Compound (VOC) emissions shall not exceed 70.0 pounds per hour.</p> <p>See b)(2)b.</p>
b.	<p>OAC rule 3745-31-05(D)</p> <p>Synthetic Minor for Hazardous Air Pollutants (HAPs) to Avoid NESHAP 40 CFR Part 63, Subpart M</p> <p>Synthetic Minor to Avoid Being a Major Source for VOC emissions.</p>	See Section B.2., b)(2)b and c)(1).
c.	ORC 3704.03(F)(4)(c)	See d)(2).

- (2) Additional Terms and Conditions
 - a. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the VOC content, usage, and emission limitations.



- b. The Volatile Organic Compound (VOC) emissions from the emissions unit P004 (Solvent Wipe and Spray Cleaning) shall not exceed 17.5 tons per year, on a rolling, 12-month summation.
 - c. The Volatile Organic Compound (VOC) content of each cleanup material employed in this emissions unit shall not exceed 7.0 pounds of VOC per gallon of cleanup material.
 - d. The hourly emission limitation outlined in b)(1) is based upon the emissions unit's potential to emit. Therefore, no records are required to demonstrate compliance with this limitation.
- c) Operational Restrictions
- (1) The maximum annual cleanup material usage in this emissions unit shall not exceed 5000 gallons, based upon a rolling, 12-month summation of the cleanup material usage figures.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall collect and record the following information each month for this emissions unit:
 - a. The company identification of each liquid organic cleanup material employed.
 - b. The VOC content (in pounds of VOC per gallon) of each cleanup material employed.
 - c. The number of gallons of each clean up material employed.
 - d. The total VOC emissions, in pounds [summation of (b. x c.) for all cleanup materials] for each calendar month.
 - e. The updated rolling, 12-month summation of the cleanup material usage, in gallons.
 - f. The updated rolling, 12-month summation of the VOC emissions, in tons. This shall include the information for the current month and the preceding eleven calendar months.
 - (2) The permit to install and operate (PTIO) application for this emissions unit, P001 was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee in the permit application. The AToxic Air Contaminant Statute[®], ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled AReview of New Sources of Air Toxic Emissions, Option A[®], as follows:



- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists= (ACGIH) Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists= (ACGIH) Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., X hours per day and Y days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$
- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or worst case toxic contaminant(s):

Toxic Contaminant: Aliphatic Naptha

TLV (mg/m3): 2,840,000

Maximum Hourly Emission Rate (lbs/hr): 70.0

Predicted 1-Hour Maximum Ground Level Concentration (ug/m3): 1737

MAGLC (ug/m3): 67,619

The permittee has demonstrated that emissions of toluene from emissions unit K002 is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the Toxic Air Contaminant Statute, ORC 3704.03(F).

- (3) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground level concentration, the permittee shall re-model the

change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV 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 toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
- c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the AToxic Air Contaminant Statute will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the AToxic Air Contaminant Statute, ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final permit to install and operate prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

- (4) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the AToxic Air Contaminant Statute, ORC 3704.03(F):
 - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the AToxic Air Contaminant Statute, ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground level concentration that demonstrated the emissions unit(s) to be in compliance with the AToxic Air Contaminant Statute, ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with the AToxic Air Contaminant Statute, ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.



- (5) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.
 - (6) See Section B.3. of this permit.
- e) Reporting Requirements
- (1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the Director by the due date identified in the Authorization section of the permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
 - (2) The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of non-complying cleanup materials (i.e. the VOC content in b)(2)b.). The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.
 - (3) The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month VOC emissions limitation outlined in b)(1). If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
 - (4) The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month cleanup material usage limitation outlined in c)(1). If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
 - (5) The permittee shall submit annual reports to the appropriate Ohio EPA District Office or local air agency, documenting any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. If no changes to the emissions unit(s), emissions, or the exhaust stack have been made, then the report shall include a statement to this effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.
 - (6) See Section B.4. of this permit.
- f) Testing Requirements
- (1) Emission Limitation:



Volatile organic compound emissions shall not exceed 70.0 pounds per hour.

Applicable Compliance Method:

Compliance shall be determined by multiplying the maximum cleanup material usage of 10 gallons per hour by the maximum VOC content limit of 7.0 pounds of VOC per gallon.

(2) Emission Limitation:

The VOC content of each cleanup material employed in this emissions unit shall not exceed 7.0 pounds of VOC per gallon of cleanup material.

Applicable Compliance Method:

Formulation data or U.S. EPA method 24 (for cleanup materials) shall be used to determine the VOC contents of the cleanup materials, employed in the emissions units.

(3) Compliance with the VOC emission limitations in b)(2)b. shall be determined by the required record keeping in d)(1).

(4) Compliance with the cleanup material usage limitations as specified in c)(1) shall be determined by the required record keeping in d)(1).

g) Miscellaneous Requirements

(1) None.



5. P002, Generator #1

Operations, Property and/or Equipment Description:

Generator # 1

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - a. None.
 - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - a. b)(1)b., c)(1) thru c)(3), d)(1) thru d)(5), e)(2) and e)(3).
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	<p>Nitrogen oxide (NOx) emissions shall not exceed 15.68 pounds per hour.</p> <p>Carbon monoxide (CO) emissions shall not exceed 4.17 pounds per hour.</p> <p>Sulfur dioxide (SO2) emissions shall not exceed 2.47 pounds per hour.</p> <p>Volatile Organic Compound (VOC) emissions shall not exceed 0.44 pounds per hour.</p> <p>Particulate emissions shall not exceed 0.49 pounds per hour.</p> <p>See c)(2) and c)(3).</p>
b.	OAC rule 3745-31-05(D) Synthetic Minor for Hazardous Air Pollutants (HAPs) to Avoid NESHAP	Nitrogen oxide (NOx) emissions shall not exceed 16.23 tons per year, on a rolling, 12-month summation.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	40 CFR Part 63, Subpart M Synthetic Minor To Avoid Being a Major Source for VOC and NOx Emissions	Carbon monoxide (CO) emissions shall not exceed 4.31 tons per year, on a rolling 12-month summation. Sulfur dioxide (SO2) emissions shall not exceed 2.56 tons per year, on a rolling 12-month summation. Volatile Organic Compound (VOC) emissions shall not exceed 0.46 tons per year, on a rolling 12-month summation. Particulate emissions shall not exceed 0.51 tons per year, on a rolling, 12-month summation. See Section B.2. and c)(1).
c.	OAC rule 3745-17-07(A)	Particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
d.	OAC rule 3745-17-11(B)(5)(a)	Particulate emissions shall not exceed 0.310 pound per million Btu of actual heat input.
e.	OAC rule 3745-18-06	Exempt per OAC rule 3745-18-06(B).
f.	OAC rule 3745-21-08	See b)(2)b.

(2) Additional Terms and Conditions

- a. The hourly emission limitations outlined in b)(1) are based upon the emissions unit's potential to emit estimated from emissions factors for each pollutant mentioned in b)(1) from USEPA AP-42, Section 3.4 for Large Stationary Diesel and Dual-Fuel Engines; the generator's maximum rated capacity of 35 gallons per hour and the heat content of 140,000 BTU per gallon of fuel used. Therefore, no records are required to demonstrate compliance with these limitations.
- b. The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology (BAT) requirements. The design of the emissions unit and the technology associated with the current operating practices satisfy the BAT requirements.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. On June 24, 2003, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-08, the requirement to satisfy the "best available



control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

c) Operational Restrictions

- (1) The annual fuel usage in this emissions unit shall not exceed 72,442 gallons on a rolling, 12-month summation.
- (2) The permittee shall burn only number two fuel oil in this emissions unit.
- (3) The sulfur content of the number two fuel oil used in this emissions unit shall not exceed 0.5% by weight.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records for the amount of number two fuel oil burned in this emissions unit on a rolling, twelve-month summation. The rolling, twelve-month summation is calculated by adding the current monthly usage of number two fuel oil, recorded in gallons, to the previous eleven months usage of number two fuel oil.
- (2) The permittee shall maintain monthly records for the tons per year emissions of particulate, sulfur dioxide, volatile organic compound, nitrogen oxide and carbon monoxide on a rolling, twelve-month summation. The rolling, twelve-month summation is calculated by adding the current monthly emissions, recorded in tons per year, to the previous eleven months emissions.
- (3) For each day during which the permittee burns a fuel other than number two fuel oil, the permittee shall maintain a record of the type and quantity of the fuel burned in this emissions unit.
- (4) The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with the following ASTM methods: ASTM method D4294, ASTM method D240, or ASTM method 6010 for sulfur content; and ASTM method D240 for heat content. Alternative, equivalent methods may be used upon written approval by the appropriate Ohio EPA District Office or local air agency.
- (5) For each shipment of oil received for burning in this emission unit, the permittee shall maintain records of the total quantity of oil received and the permittee's or oil supplier's analyses for sulfur content and heat content.
- (6) See Section B.3. of this permit.

e) Reporting Requirements

- (1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the Director by the due date identified in the Authorization section of the permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.



- (2) The permittee shall submit deviation (excursion) reports for any monthly record(s) which shows an exceedance of annual allowable limitation of 72,442 gallons of number two fuel oil on a rolling, twelve-month summation.
- (3) The permittee shall submit deviation (excursion) reports for any monthly record(s) which shows an exceedance of the annual allowable tons per year emissions of particulate, sulfur dioxide, volatile organic compound, nitrogen oxide and carbon monoxide emissions on a rolling, 12 month summation.
- (4) See Section B.4. of this permit.

f) Testing Requirements

- (1) Compliance with the emission limitations specified in b)(1) shall be demonstrated by the use of emission factors in AP-42, Fifth Edition, Section 3.4; for Large Stationary Diesel and all Dual Diesel Engines.

The hourly emission rates are estimated based upon maximum hourly fuel usage rate for this emissions unit (35 gallons per hour), emission factors specific to the pollutants listed in b)(1) from AP-42 Table 3.4-1; 10/96, and the heat value of the fuel (140,000 Btu per gallon).

The tons per year limitations are estimated based upon the fuel usage restriction established in c)(1) for this emissions unit (72,442 gallons per year), emission factors specific to the pollutants listed in b)(1) from AP-42 Table 3.4-1; 10/96, the heat value of the fuel (140,000 Btu per gallon) and 1 ton per 2000 pounds conversion factor.

- (2) Compliance with the 0.5% by weight sulfur limitation shall be demonstrated by information contained in d)(4) and d)(5).
- (3) Compliance with the particulate emission limitation specified in OAC 3745-17-07(A) shall be demonstrated by the methods outlined in OAC 3745-17-03(B)(3).

g) Miscellaneous Requirements

- (1) None.



6. P003, Generator # 2

Operations, Property and/or Equipment Description:

Generator # 2

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - a. None.
 - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - a. b)(1)b., c)(1) thru c)(3), d)(1) thru d)(5), e)(2) and e)(3).
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	<p>Nitrogen oxide (NOx) emissions shall not exceed 24.19 pounds per hour.</p> <p>Carbon monoxide (CO) emissions shall not exceed 6.43 pounds per hour.</p> <p>Sulfur dioxide (SO2) emissions shall not exceed 3.82 pounds per hour.</p> <p>Volatile Organic Compound (VOC) emissions shall not exceed 0.68 pounds per hour.</p> <p>Particulate emissions shall not exceed 0.76 pounds per hour.</p> <p>See c)(2) and c)(3).</p>
b.	OAC rule 3745-31-05(D) Synthetic Minor for Hazardous Air Pollutants (HAPs) to Avoid NESHAP	Nitrogen oxide (NOx) emissions shall not exceed 25.04 tons per year, on a rolling, 12-month summation.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	40 CFR Part 63, Subpart M Synthetic Minor To Avoid Being a Major Source for VOC and NOx Emissions	Carbon monoxide (CO) emissions shall not exceed 6.65 tons per year, on a rolling 12-month summation. Sulfur dioxide (SO2) emissions shall not exceed 3.95 tons per year, on a rolling 12-month summation. Volatile Organic Compound (VOC) emissions shall not exceed 0.70 tons per year, on a rolling 12-month summation. Particulate emissions shall not exceed 0.78 tons per year, on a rolling, 12-month summation. See Section B.2. and c)(1).
c.	OAC rule 3745-17-07(A)	Particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
d.	OAC rule 3745-17-11(B)(5)(a)	Particulate emissions shall not exceed 0.310 pound per million Btu of actual heat input.
e.	OAC rule 3745-18-06	Exempt per OAC rule 3745-18-06(B).
f.	OAC rule 3745-21-08	See b)(2)b.

(2) Additional Terms and Conditions

- a. The hourly emission limitations outlined in b)(1) are based upon the emissions unit's potential to emit estimated from emissions factors for each pollutant mentioned in b)(1) from USEPA AP-42, Section 3.4 for Large Stationary Diesel and Dual-Fuel Engines; the generator's maximum rated capacity of 54 gallons per hour and the heat content of 140,000 BTU per gallon of fuel used. Therefore, no records are required to demonstrate compliance with these limitations.
- b. The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology (BAT) requirements. The design of the emissions unit and the technology associated with the current operating practices satisfy the BAT requirements.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. On June 24, 2003, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-08, the requirement to satisfy the "best available



control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

c) Operational Restrictions

- (1) The annual fuel usage in this emissions unit shall not exceed 111,797 gallons on a rolling, 12-month summation.
- (2) The permittee shall burn only number two fuel oil in this emissions unit.
- (3) The sulfur content of the number two fuel oil used in this emissions unit shall not exceed 0.5% by weight.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records for the amount of number two fuel oil burned in this emissions unit on a rolling, twelve-month summation. The rolling, twelve-month summation is calculated by adding the current monthly usage of number two fuel oil, recorded in gallons, to the previous eleven months usage of number two fuel oil.
- (2) The permittee shall maintain monthly records for the tons per year emissions of particulate, sulfur dioxide, volatile organic compound, nitrogen oxide and carbon monoxide on a rolling, twelve-month summation. The rolling, twelve-month summation is calculated by adding the current monthly emissions, recorded in tons per year, to the previous eleven months emissions for each pollutant.
- (3) For each day during which the permittee burns a fuel other than number two fuel oil, the permittee shall maintain a record of the type and quantity of the fuel burned in this emissions unit.
- (4) The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with the following ASTM methods: ASTM method D4294, ASTM method D240, or ASTM method 6010 for sulfur content; and ASTM method D240 for heat content. Alternative, equivalent methods may be used upon written approval by the appropriate Ohio EPA District Office or local air agency.
- (5) For each shipment of oil received for burning in this emission unit, the permittee shall maintain records of the total quantity of oil received and the permittee's or oil supplier's analyses for sulfur content and heat content.
- (6) See Section B.3. of this permit.

e) Reporting Requirements

- (1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the Director by the due date identified in the Authorization section of the permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.



- (2) The permittee shall submit deviation (excursion) reports for any monthly record(s) which shows an exceedance of annual allowable limitation of 111,797 gallons of number two fuel oil on a rolling, twelve-month summation.
- (3) The permittee shall submit deviation (excursion) reports for any monthly record(s) which shows an exceedance of the annual allowable tons per year emissions of particulate, sulfur dioxide, volatile organic compound, nitrogen oxide and carbon monoxide emissions on a rolling, 12 month summation.
- (4) See Section B.4. of this permit.

f) Testing Requirements

- (1) Compliance with the emission limitations specified in b)(1) shall be demonstrated by the use of emission factors in AP-42, Fifth Edition, Section 3.4; for Large Stationary Diesel and all Dual Diesel Engines.

The hourly emission rates are estimated based upon maximum hourly fuel usage rate for this emissions unit (54 gallons per hour), emission factors specific to the pollutants listed in b)(1) from AP-42 Table 3.4-1; 10/96, and the heat value of the fuel (140,000 Btu per gallon).

The tons per year limitations are estimated based upon the fuel usage restriction established in c)(1) for this emissions unit (111,797 gallons per year), emission factors specific to the pollutants listed in b)(1) from AP-42 Table 3.4-1; 10/96, the heat value of the fuel (140,000 Btu per gallon) and 1 ton per 2000 pounds conversion factor.

- (2) Compliance with the 0.5% by weight sulfur limitation shall be demonstrated by information contained in d)(4) and d)(5).
- (3) Compliance with the particulate emission limitation specified in OAC 3745-17-07(A) shall be demonstrated by the methods outlined in OAC 3745-17-03(B)(3).

g) Miscellaneous Requirements

- (1) None.