State of Ohio Environmental Protection Agency

RE: FINAL PERMIT TO INSTALL MODIFICATION **CERTIFIED MAIL**
CLERMONT COUNTY

Street Address:
50 West Town Street, Suite 700
Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329
Mailing Address:
Lazarus Gov. Center
P.O. Box 1049

Application No: 14-05910
Fac ID: 1413000402
DATE: 12/13/2007

Mobilized Environmental Systems Inc
Lisa Lairson
1032 Seabrook Way
Cincinnati, OH 45245

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

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: **USEPA** **HCDES**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install **Issue Date: 12/13/2007**
Terms and Conditions **Effective Date: 12/13/2007**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 14-05910

Application Number:	14-05910
Facility ID:	1413000402
Permit Fee:	**$100**
Name of Facility:	Mobilized Environmental Systems Inc
Person to Contact:	Lisa Lairson
Address:	1032 Seabrook Way Cincinnati, OH 45245

Location of proposed air contaminant source(s) [emissions unit(s)]:
1032 Seabrook Way
Withamsville, **Ohio**

Description of proposed emissions unit(s):
This modification will allow the facility to have VOC content of 6.2 lbs/gal while coating architectural aluminum parts and is required to maintain daily record keeping.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon

the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

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

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

10. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

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

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

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

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

Pollutant	Tons Per Year
VOC	33.02
Single HAP	9.9
Combined HAPs	24.9

Modification Issued: 12/13/2007

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

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K004) - Drive through paint spray booth

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Volatile Organic Compound (VOC) emissions shall not exceed: 291.4 pounds per day from coating usage only; and 33.02 tons per year from coatings and cleanup materials. See terms and conditions A.2.a, A.2.b, B.1, B.2, and B.3.
OAC rule 3745-21-09(U)(1)(c)	See term and condition A.2.c.
OAC rule 3745-21-09(U)(1)(h)	See term and condition A.2.d.
OAC rule 3745-31-05(C)	See term and condition A.2.e.

2. Additional Terms and Conditions

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

2.b The VOC content of each cleanup material employed in this emissions unit shall not exceed 7.17 pounds of VOC per gallon of cleanup material.

2.c The VOC content of each coating, except high performance architectural aluminum coatings, employed in this emissions unit shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.

2.d The VOC content of each high performance architectural aluminum coating shall not exceed 6.2 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.

2.e The total usage of hazardous air pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units K001 (Drive through

paint booth # 1), K002 (Drive through paint booth # 2), K003 (Miscellaneous metal parts paint spray booth), K004 (Drive through paint spray booth) and any registration status and /or permit exempt emissions units, shall not exceed 9.9 TPY* for any single HAP, as a rolling, 12-month summation and 24.9 TPY* for any combination of HAPs, as a rolling, 12-month summation.

*This assumes that the amount of HAPs used is equivalent to the amount of HAPs that will evaporate and be emitted.

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

B. Operational Restrictions

1. The maximum daily coating usage for emissions unit K004 (Drive through paint spray booth) shall not exceed 47 gallons, excluding water and exempt solvents.

2. The maximum annual coating usage for emissions unit K004 (Drive through paint spray booth) shall not exceed 12,480 gallons, excluding water and exempt solvents.

3. The maximum annual cleanup material usage for emissions unit K004 (Drive through paint spray booth) shall not exceed 3120 gallons.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the emissions units identified in term and condition A.2.e:

   a. the name and identification number of each coating employed;

   b. the individual 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 number 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 usage** for each HAP from all coatings and cleanup materials employed, in pounds or tons [for each HAP, the sum of (b) times (d) for all coatings plus the sum of (f) times (h) for all cleanup materials, and divided by 2,000 pounds per ton if the units are in tons];

j. the total combined HAP usage** from all coatings and cleanup materials employed, in pounds or tons [the sum of (c) times (d) for all coatings plus the sum of (g) times (h) for all cleanup materials, and divided by 2,000 pounds per ton if the units are in tons];

k. the updated rolling, 12-month summation of usage for each individual HAP**, in 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 usage for the total combined HAPs**, in tons. This shall include the information for the current month and the preceding eleven calendar months.

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

** This assumes the amount of HAPs used is equivalent to the amount of HAPs that will evaporate and be emitted.

2. The permittee shall collect and record the following information each day for this emissions unit:

a. the name, type (miscellaneous metal parts or high performance architectural aluminum coatings) and identification number of each coating employed;

b. the VOC content for each coating, in pounds of VOC per gallon of coating,

excluding water and exempt solvents;

c. the volume, in gallons, excluding water and exempt solvents, of each coating employed; and

d. the total VOC emissions from total coating(s) usage in pounds per day (b x c).

3. The permittee shall collect and record the following information each month for this emissions unit:

a. the name and identification number of each cleanup material employed;

b. the VOC content for each cleanup material, in pounds of VOC per gallon of cleanup material;

c. the volume, in gallons, of each cleanup material employed; and

d. the total VOC emissions from all coating(s) and cleanup materials in pounds per month which includes the summation of daily VOC emissions from coating usage in term C.2.d. plus the monthly VOC emissions in pounds per month from cleanup materials usage [$\sum$C.2.d + (C.3.b x C.3.c.)]

4. The permit to install for emissions unit K004 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application and supplemental information after submittal of the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN3 model(or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN3 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Hexamethylene Di-isocyanate
TLV (ug/m3): 34
Maximum Hourly Emission Rate (lbs/hr): 0.023 (emissions unit K004)
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 0.80
MAGLC (ug/m3): 0.82

Pollutant: Phosphoric acid
TLV (ug/m3): 1.0
Maximum Hourly Emission Rate (lbs/hr): 1.36 (emissions unit K004)
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 4.59
MAGLC (ug/m3): 23.80

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

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied 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 the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimus level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

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

a. a description of the parameters changed(composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of it's evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP emission limitations outlined in term and condition A.2.e. 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).

2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily and/or monthly record showing the use of non-complying coatings and or cleanup materials (i.e. the VOC content limitations in terms A.2.b, A.2.c and A.2.d). 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 submit annual reports of the total coating and cleanup material usage, in gallons in emissions unit K004 for the previous calendar year. These reports shall be submitted by January 31 of each year.

4. The permittee shall submit annual reports which specify the total VOC emissions from emissions unit K004 for the previous calendar year. These reports shall be submitted by January 31 of each year.

5. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any exceedance of the daily coating usage limitation in term B.1. 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.

E. Testing Requirements

1. Compliance with the emission limitations specified in Section A shall be determined by the following methods:

   a. Emission Limitations:
   Volatile organic compound emissions shall not exceed 291.4 pounds per day from coatings only and 33.02 tons per year from coatings and cleanup material.

   Applicable Compliance Method:
   Compliance with the pounds per day limitation on VOC emissions shall be determined by using the following equation:

   i. pounds per day of VOC emissions from coatings only = A x B; where

      A = VOC content of the coatings, as applied in pounds per gallon, excluding water and exempt solvents (6.2 pounds of VOC per gallon of coatings, excluding water and exempt solvents);

      B = maximum daily usage of coatings in gallons per day (47 gallons per day)

   ii. Compliance with the tons per year limitation on VOC emissions shall be determined based on the record keeping requirements in term C.3.

   b. Emission Limitations:
   The VOC content of each cleanup material employed in this emissions unit shall not exceed 7.17 pounds of VOC per gallon of cleanup material, as applied.

   The VOC content of each coating, except high performance architectural aluminum coatings, 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 high performance architectural aluminum coating shall not exceed 6.2 pounds of VOC per gallon of coating, excluding water and exempt solvents, 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.

2. Compliance with the HAP usage limitations specified in term and condition A.2.e shall be determined by the required record keeping in term and condition C.1.

3. Compliance with the coating and cleanup material usage limitations as specified in terms and conditions B.1, B.2, and B.3 shall be determined by the required record keeping in terms and condition C.2 and C.3.

F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A, B, C.1, C.2, C.3, D and E.

2. The terms and conditions in this permit to install supersede the terms and conditions in Permit to Install 14-05910, as issued on March 22, 2007.

NEW SOURCE REVIEW FORM B

PTI Number: 14-05910 Facility ID: 1413000402

FACILITY NAME Mobilized Environmental Systems Inc

FACILITY DESCRIPTION This modification will allow the facility to have VOC content of 6.2 lbs/gal while coating architectural aluminum parts and is required to maintain daily record keeping.

CITY/TWP Withamsville

SIC CODE 3715 SCC CODE EMISSIONS UNIT ID K004

EMISSIONS UNIT DESCRIPTION Drive through paint spray booth

DATE INSTALLED

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM_{10}					
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
Enter Determination

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY?

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? $

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? YES NO

IDENTIFY THE AIR CONTAMINANTS: