Ohio Environmental Protection Agency
John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

Certified Mail

9/19/2012

Tom Fleming
CTL Aerospace Inc.
5616 SPELLMIRE DR.
CINCINNATI, OH 45246

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1409000646
Permit Number: P0111114
Permit Type: Administrative Modification
County: Butler

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. Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

The issuance of this PTI is a final action of the Director 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, made payable to “Ohio Treasurer Josh Mandel," 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

If you have any questions, please contact Southwest Ohio Air Quality Agency at (513)946-7777or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPCWeb page,www.epa.ohio.gov/dapc, by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

Michael W. Ahern

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

Cc: SWOAQA

Ohio | Environmental Protection Agency

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
CTL Aerospace Inc.

Facility ID:	1409000646
Permit Number:	P0111114
Permit Type:	Administrative Modification
Issued:	9/19/2012
Effective:	9/19/2012
Expiration:	9/19/2017

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
CTL Aerospace Inc.

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Authorization

Facility ID: 1409000646
Application Number(s): M0001923
Permit Number: P0111114
Permit Description: Administrative modification to correct expiration date. This is a non-Title V facility, however they have a FEPTIO to avoid RACT.
Permit Type: Administrative Modification
Permit Fee: $0.00
Issue Date: 9/19/2012
Effective Date: 9/19/2012
Expiration Date: 9/19/2017
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

CTL Aerospace Inc.
5616 SPELLMIRE DR.
CINCINNATI, OH 45246

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:

Southwest Ohio Air Quality Agency
250 William Howard Taft Rd.
Cincinnati, OH 45219
(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

Scott J. Nally
Director

Authorization (continued)

Permit Number: P0111114
Permit Description: Administrative modification to correct expiration date. This is a non-Title V facility, however they have a FEPTIO to avoid RACT.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	**P009**
Company Equipment ID:	Solvent Wipe Cleaning Operation
Superseded Permit Number:	P0110484
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**R003**
Company Equipment ID:	Paint Spray Booth for Plastic Parts
Superseded Permit Number:	P0110484
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**R005**
Company Equipment ID:	Blowtherm repair booth
Superseded Permit Number:	P0110484
General Permit Category and Type:	Not Applicable

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. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement.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 takenby 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 Southwest Ohio Air Quality Agency 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[1] 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 emissions 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.

[1]Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

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 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.

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) None.

C. Emissions Unit Terms and Conditions

1. P009, Solvent Wipe Cleaning Operation

Operations, Property and/or Equipment Description:

Solvent wipe cleaning operation - modified

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)(4).

(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)a., d)(2), d)(3), e)(2), f)(1)b., f)(2) and g)(1).

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(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 are identified below. 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 205 pounds per day. See b)(2)a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(D)	VOC emissions from emissions units R003, R005 and P009 combined, shall not exceed 24.9 tons per year based on a rolling, 12-month summation.

(2) Additional Terms and Conditions

a. The total volatile organic compound (VOC) emissions from all the aerospace manufacturing and rework operations and associated cleaning and washoff processes located at this facility shall not exceed 24.9 TPY based on a rolling, 12-month summation. The 24.9 TPY rolling, 12-month summation includes emissions from non-metal and metal coating. "Coating" means a protective, decorative, or functional material applied in a thin layer to a surface. Such materials include, but are not limited to, paints, topcoats, varnishes, sealers, stains, washcoats, basecoats, inks and temporary protective coatings. "Cleaning material" means organic solvent used to remove coating materials from equipment used in aerospace manufacturing and rework operations. "Washoff material" means organic solvent used to remove coating from a substrate. "Volatile organic compound" means any volatile organic compound as defined in OAC rule 3745-21-01(B)(6).

b. Compliance with OAC rule 3745-31-05(A)(3) shall be determined by compliance with the emission limitations.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information for each day for this emissions unit:

a. the company identification for each organic cleanup solvent employed.

b. the number of gallons of each organic cleanup solvent employed.

c. the VOC content of each organic cleanup solvent employed, in pounds per gallon.

d. the total organic compound emission rate for all organic cleanup solvents employed, in pounds per day [calculated by taking the sum of (b) times (c) for each organic cleanup solvent employed].

In addition, these records shall be summarized at the end of each year to calculate the annual VOC emissions.

(2) The permittee shall collect and record the following information each month for emissions units R003, R005 and P009 combined for the purpose of demonstrating compliance with the annual emission rate of 24.9 TPY combined, based on a rolling 12-month summation:

a. the name and identification number of each coating, cleaning and washoff material employed.

b. the volume, in gallons, of each coating, cleaning and washoff material employed.

c. the VOC content of each coating, cleaning and washoff material, in pounds of VOC per gallon, as applied.

d. the amount of VOC emitted for all coating, cleaning and washoff materials employed, in pounds per month.

e. the rolling 12-month* usage for coating, cleaning and washoff materials, in gallons.

f. the rolling 12-month* VOC emission rate in tons per year (in tons, rounded off to one decimal place).

*A rolling 12-month period includes the previous set of 12 months.

Monthly records shall be completed within 15 days following the end of each calendar month.

The records shall he maintained for five years and upon request, the permittee shall submit such records to the appropriate Ohio EPA District Office or local air agency.

(3) The permittee shall maintain for this facility all purchase orders and invoices of VOC - containing materials. The permittee shall retain such purchase orders and invoices for at least five years from the date of issuance. Upon request, the permittee shall make available to the Director of the Ohio EPA, or an authorized representative of the Director, such purchase orders and invoices for use in confirming the general accuracy of the records maintained and the reports submitted regarding material usage.

(4) The permit to install for this emissions unit, P009 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN3 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN3 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: methyl ethyl ketone
TLV (ug/m3): 589,800
Maximum Hourly Emission Rate (lbs/hr): 9.26
Predicted 1 Hour Maximum Ground-level Concentration (ug/m3): 691.2
Maximum Acceptable Ground-level Concentration (MAGLC) (ug/m3): 14,043

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 minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, 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 still satisfy the "Air Toxic Policy":

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

e. documentation of the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

f. where 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.

e) Reporting Requirements

(1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this 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. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-

Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.

(2) If the facility (emissions units R003, R005 and P009) has a rolling, 12 month record that exceeds 24.9 tons of VOC from combined operations associated with aerospace manufacturing and rework operations the permittee shall submit the following:

a. Within 30 days after the end of that rolling, 12-month period in which the exceedance occurred, a notification to the Hamilton County Department of Environmental Services that the VOC emission limit was exceeded.

b. Within three months after the end of that rolling, 12-month period in which the exceedance occurred, a compliance plan to the Hamilton County Department of Environmental Services to comply with the presumptive RACT standards specified within USEPA document 453/R-97-004 " Control of Volatile Organic Compound Emissions from Aerospace Manufacturing and Rework Operations" (December 1997). Any divergence from the presumptive RACT standards and the model rule provided within that document shall be described at the time of the submittal of the 3-month compliance plan. Compliance with the presumptive RACT standards is to be achieved within 12 months after the rolling, 12-month period exceedance, unless otherwise requested by the permittee and approved by USEPA as a revision to Ohio's state implementation plan for ozone.

c. Exceeding the 24.9 TPY VOC/OC limit is a violation for each day of the last month of each 12 month period in which the 24.9 TPY limit is exceeded regardless of whether a compliance plan is submitted.

f) Testing Requirements

(1) Compliance with the emission limitation(s) in b)(1) shall be determined in accordance with the following method(s):

a. Emission Limitations:

Volatile organic compound (VOC) emissions shall not exceed 205 lbs/day.

Applicable Compliance Method:

Compliance shall be determined by the recordkeeping requirements of d)(1).

b. Emission Limitation:

VOC emissions from emissions units R003, R005 and P009 combined, shall not exceed 24.9 tons per year based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be determined by the recordkeeping requirements of d)(2).

(2) OAC rule 3745-21-10(B) shall be used to determine the VOC contents of the coatings, cleaning and washoff 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 ,cleaning or washoff material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for the coating ,cleaning or washoffmaterial,to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

g) Miscellaneous Requirements

(1) This Federally Enforceable Permit limits the potential emissions of organic compounds from the aerospace manufacturing and rework processes and associated cleaning and washoff processes located at this facility to no more than 24.9 TPY during any rolling, 12-month period. Should VOC/OC emissions from the aerospace manufacturing and rework processes and associated cleaning and washoff processes exceed 24.9 TPY during any rolling, 12-month period, this facility should notify the Hamilton County Department of Environmental Services within 30 days.

2. R003, Paint Spray Booth for Plastic Parts

Operations, Property and/or Equipment Description:

Paint spray booth for coating fiberglass reinforced plastic parts - modified

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)(10)

(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)c., d)(3), d)(4), e)(2), f)(1)c., f)(3) and g)(1)

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(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 are identified below. 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 40 pounds per day and 7.3 tons per year. See b)(2)a. and c)(2). The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D) and OAC rule 3745-17-11(C).
b.	OAC rule 3745-31-05(D)	VOC emissions from emissions units R003, R005 and P009 combined, shall not exceed 24.9 tons per year based on a rolling, 12-month summation. See b)(2)c.
c.	OAC rule 3745-17-11(C)	See c)(1).

(2) Additional Terms and Conditions

a. The hexamethylenediisocyanate emissions from this emissions unit shall not exceed 0.0095 lb/hr.

b. Compliance with the requirements of OAC rule 3745-31-05(A) shall be demonstrated by compliance with the specified emission limits and usage limits.

c. The total volatile organic compound (VOC) emissions from all the aerospace manufacturing and rework operations and associated cleaning and washoff processes located at this facility shall not exceed 24.9 TPY based on a rolling, 12-month summation. The 24.9 TPY rolling, 12-month summation includes emissions from non-metal and metal coating. "Coating" means a protective, decorative, or functional material applied in a thin layer to a surface. Such materials include, but are not limited to, paints, topcoats, varnishes, sealers, stains, washcoats, basecoats, inks and temporary protective coatings. "Cleaning material" means organic solvent used to remove coating materials from equipment used in aerospace manufacturing and rework operations. "Washoff material" means organic solvent used to remove coating from a substrate. "Volatile organic compound" means any volatile organic compound as defined in OAC rule 3745-21-01(B)(6).

c) Operational Restrictions

(1) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

(2) The amount of coating CT010083 used in this emissions unit shall not exceed 0.30 gallon per hour, as employed.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information for each day for the coating operation:

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

b. the number of gallons of each coating and cleanup material employed;

c. the VOC content of each coating and cleanup material employed, in pounds of VOC per gallon.

d. the VOC emission rate for all coatings and cleanup materials, i.e., (b)x (c), in pounds VOC per day.

These daily records shall be summarized annually to demonstrate compliance with the annual VOC emission limitation of 7.3 TPY.

(2) The permittee shall collect and record the following information for each hour of coating operation when using CT010083, or any coating containing hexamethylenediisocyanate:

a. the number of gallons of CT010083 used per hour of operation;

b. the number of gallons of coating (containing hexamethylenediisocyanate) used per hour of operation;

c. the hexamethylenediisocyante content (of each coating containing hexamethylenediisocyante), in pounds hexamethylenediisocyanate per gallon of coating; and

d. the hourly hexamethylenediisocyanate emission rate, i.e., (c)(d), in pounds of hexamethylenediisocyante per hour.

(3) The permittee shall collect and record the following information each month for emissions units R003, R005 and P009 combined:

a. The name and identification number of each coating, cleaning and washoff material employed;

b. the volume, in gallons, of each coating, cleaning and washoff material employed;

c. the VOC content of each coating, cleaning and washoff material, in pounds of VOC per gallon, as applied;

d. the amount of VOC emitted for all coating, cleaning and washoff materials employed, in pounds per month;

e. the rolling 12-month* usage for coating, cleaning and washoff materials, in gallons;

f. The rolling 12-month* VOC emission rate in tons per year (in tons, rounded off to one decimal place).

*A rolling 12-month period includes the previous set of 12 months.

Monthly records shall be completed within 15 days following the end of each calendar month.

The records shall he maintained for five years and upon request, the permittee shall submit such records to the appropriate Ohio EPA District Office or local air agency.

(4) The permittee shall maintain for this facility all purchase orders and invoices of VOC - containing materials. The permittee shall retain such purchase orders and invoices for at least five years from the date of issuance. Upon request, the permittee shall make available to the Director of the Ohio EPA, or an authorized representative of the Director, such purchase orders and invoices for use in confirming the general accuracy of the records maintained and the reports submitted regarding material usage.

(5) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

(6) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

(7) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

(8) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:

a. the date of the inspection;
b. a description of each/any problem identified and the date it was corrected;
c. a description of any maintenance and repairs performed; and
d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

(9) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

(10) The permit to install for this emissions unit R003 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN3 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN3 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: formaldehyde
TLV (ug/m3): 370
Maximum Hourly Emission Rate (lbs/hr): 0.006
Predicted 1 Hour Maximum Ground-level Concentration (ug/m3): 0.5341
Maximum Acceptable Ground-level Concentration (MAGLC) (ug/m3): 8.809

Pollutant: 2 butoxy ethanol
TLV (ug/m3): 121,000
Maximum Hourly Emission Rate (lbs/hr): 2.943
Predicted 1 Hour Maximum Ground-level Concentration (ug/m3): 248.4
Maximum Acceptable Ground-level Concentration (MAGLC) (ug/m3): 2881

Pollutant: butyl alcohol
TLV (ug/m3): 152,000
Maximum Hourly Emission Rate (lbs/hr): 3.511
Predicted 1 Hour Maximum Ground-level Concentration (ug/m3): 297
Maximum Acceptable Ground-level Concentration (MAGLC) (ug/m3): 3619

Pollutant: cyclohexanone
TLV (ug/m3): 100,000
Maximum Hourly Emission Rate (lbs/hr): 2.652
Predicted 1 Hour Maximum Ground-level Concentration (ug/m3): 224
Maximum Acceptable Ground-level Concentration (MAGLC) (ug/m3): 2381

Pollutant: diethylenetriamine
TLV (ug/m3): 4,200
Maximum Hourly Emission Rate (lbs/hr): 0.609
Predicted 1 Hour Maximum Ground-level Concentration (ug/m3): 51.43
Maximum Acceptable Ground-level Concentration (MAGLC) (ug/m3): 100

Pollutant: hexamethylenediisocyanate
TLV (ug/m3): 34
Maximum Hourly Emission Rate (lbs/hr): 0.0095
Predicted 1 Hour Maximum Ground-level Concentration (ug/m3): 0.8046
Maximum Acceptable Ground-level Concentration (MAGLC) (ug/m3): 0.81

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 minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, 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 still satisfy the "Air Toxic Policy":

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

e. documentation of the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

f. where 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.

e) Reporting Requirements

(1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this 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. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.

(2) If the facility (emissions units R003, R005 and P009) has a rolling, 12 month record that exceeds 24.9 tons of VOC from combined operations associated with aerospace manufacturing and rework operations the permittee shall submit the following:

a. Within 30 days after the end of that rolling, 12-month period in which the exceedance occurred, a notification to the Hamilton County Department of Environmental Services that the VOC emission limit was exceeded.

b. Within three months after the end of that rolling, 12-month period in which the exceedance occurred, a compliance plan to the Hamilton County Department of Environmental Services to comply with the presumptive RACT standards specified within USEPA document 453/R-97-004 " Control of Volatile Organic Compound Emissions from Aerospace Manufacturing and Rework Operations" (December 1997). Any divergence from the presumptive RACT standards and the model rule provided within that document shall be described at the time of the submittal of the 3-month compliance plan. Compliance with the presumptive RACT standards is to be achieved within 12 months after the rolling, 12-month period exceedance, unless otherwise requested by the permittee and approved by USEPA as a revision to Ohio's state implementation plan for ozone.

c. Exceeding the 24.9 TPY VOC/OC limit is a violation for each day of the last month of each 12 month period in which the 24.9 TPY limit is exceeded regardless of whether a compliance plan is submitted.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations:

Volatile Organic compound (VOC) emissions shall not exceed 40 pounds per day and 7.3 TPY.

Applicable Compliance Method:

Compliance shall be determined by the recordkeeping requirements of d)(1).

b. Emission Limitation:

The hexamethylenediisocyanate emissions from this emissions unit shall not exceed 0.0095 lb/hr.

Applicable Compliance Method:

Compliance shall be determined by the recordkeeping requirements of d)(2).

c. Emission Limitation:

VOC emissions from emissions units R003, R005 and P009 combined, shall not exceed 24.9 tons per year based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be determined by the recordkeeping requirements of d)(3).

(2) Emission Limitation:

The amount of coating CT010083 used in this emissions unit shall not exceed 0.30 gallon per hour, as employed.

Applicable Compliance Method:

Compliance shall be determined by the recordkeeping requirements of d)(2).

(3) OAC rule 3745-21-10(B) shall be used to determine the VOC contents of the coatings, cleaning and washoff 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 cleaning or washoff material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for the coating ,cleaning or washoffmaterial,to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

g) Miscellaneous Requirements

(1) This Federally Enforceable Permit limits the potential emissions of organic compounds from the aerospace manufacturing and rework processes and associated cleaning and washoff processes located at this facility to no more than 24.9 TPY during any rolling, 12-month period. Should VOC/OC emissions from the aerospace manufacturing and rework processes and associated cleaning and washoff processes exceed 24.9 TPY during any rolling, 12-month period, this facility should notify the Hamilton County Department of Environmental Services within 30 days.

3. R005, Blowtherm repair booth

Operations, Property and/or Equipment Description:

Blowtherm repair booth - modified

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)(11)

(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)e., d)(4), d)(5), e)(2), f)(1)c., f)(3) and g)(1).

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(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 are identified below. 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)	See b)(2)a., b)(2)b. and b)(2)c. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D) and OAC rule 3745-17-11(C).
b.	OAC rule 3745-31-05(D)	VOC emissions from emissions units R003, R005 and P009 combined, shall not exceed 24.9 tons per year based on a rolling, 12-month summation. See b)(2)e.
c.	OAC rule 3745-17-11(C)	See c)(1).
d.	OAC rule 3745-21-09(U)(2)(f)	The requirements of this rule are equivalent to the requirements of OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

a. The volatile organic compound (VOC) emission rate shall not exceed the following when coating metal parts:

i. 67 pounds per day and 12.2 tons per year from coatings.

ii. 8 pounds per day and 1.5 tons per year from liquid organic cleanup materials.

b. The VOC emissions shall not exceed the following when coating non-metal parts:

i. 40 pounds per day and 7.3 tons per year combined from coatings and liquid organic cleanup material.

c. The VOC content as applied of any coating employed shall not exceed 6.7 pounds per gallon, including water and exempt solvents.

d. Compliance with the requirements of OAC rule 3745-31-05(A) shall be demonstrated by compliance with the specified emission limits and VOC content limit.

e. The total volatile organic compound (VOC) emissions from all the aerospace manufacturing and rework operations and associated cleaning and washoff processes located at this facility shall not exceed 24.9 TPY based on a rolling, 12-month summation. The 24.9 TPY rolling, 12-month summation includes emissions from non-metal and metal coating. "Coating" means a protective, decorative, or functional material applied in a thin layer to a surface. Such materials include, but are not limited to, paints, topcoats, varnishes, sealers, stains, washcoats, basecoats, inks and temporary protective coatings. "Cleaning material" means organic solvent used to remove coating materials from equipment used in aerospace manufacturing and rework operations. "Washoff material" means organic solvent used to remove coating from a substrate. "Volatile organic compound" means any volatile organic compound as defined in OAC rule 3745-21-01(B)(6).

c) Operational Restrictions

(1) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

(2) The coating usage shall not exceed 10 gallons per day for coating metal parts in this emissions unit.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information for each day when coating metal parts:

a. The name and identification number of each coating and liquid organic cleanup material employed.

b. The VOC content of each coating and liquid organic cleanup material employed, in pounds per gallon, as applied, including water and exempt solvents.

c. The volume in gallons, of each coating and liquid organic cleanup material employed for coating metal parts.

d. The total volume, in gallons of all coatings employed for coating metal parts.

e. The daily VOC emissions from coating metal parts, calculated by taking the sum of (b) times (c) for each coating employed for coating metal parts, in pounds.

f. The daily VOC emissions from the use of cleanup materials associated with coating metal parts, calculated by taking the sum of (b) times (c) for each liquid organic cleanup material employed for coating metal parts, in pounds.

(2) The permittee shall collect and record the following information for each day when coating non-metal parts:

a. The name and identification number of each coating and liquid organic cleanup material employed.

b. The VOC content of each coating and liquid organic cleanup material employed, in pounds per gallon, as applied, including water and exempt solvents.

c. The volume in gallons, of each coating and liquid organic cleanup material employed for coating non-metal parts.

d. The daily VOC emissions from coating non-metal parts, calculated by taking the sum of (b) times (c) for each coating employed for coating non-metal parts, in pounds.

(3) The permittee shall collect and record the following information each year:

a. The VOC emissions from all coatings when coating metal parts, in tons [the summation off d)(1)e. for all days during the calendar year].

b. The VOC emissions from liquid organic cleanup materials when coating metal parts, in tons [the summation off d)(1)f. for all days during the calendar year].

c. The VOC emissions from coatings and liquid organic cleanup materials when coating non-metal parts, in tons [the summation off d)(2)d. for all days during the calendar year].

(4) The permittee shall collect and record the following information each month for emissions units R003, R005 and P009 combined:

a. The name and identification number of each coating, cleaning and washoff material employed;

b. the volume, in gallons, of each coating, cleaning and washoff material employed;

c. the VOC content of each coating, cleaning and washoff material, in pounds of VOC per gallon, as applied;

d. the amount of VOC emitted for all coating, cleaning and washoff materials employed, in pounds per month;

e. the rolling 12-month* usage for coating, cleaning and washoff materials, in gallons;

f. The rolling 12-month* VOC emission rate in tons per year (in tons, rounded off to one decimal place).

*A rolling 12-month period includes the previous set of 12 months.

Monthly records shall be completed within 15 days following the end of each calendar month.

The records shall he maintained for five years and upon request, the permittee shall submit such records to the appropriate Ohio EPA District Office or local air agency.

(5) The permittee shall maintain for this facility all purchase orders and invoices of VOC - containing materials. The permittee shall retain such purchase orders and invoices for at least five years from the date of issuance. Upon request, the permittee shall make available to the Director of the Ohio EPA, or an authorized representative of the Director, such purchase orders and invoices for use in confirming the general accuracy of the records maintained and the reports submitted regarding material usage.

(6) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

(7) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

(8) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

(9) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:

a. the date of the inspection;
b. a description of each/any problem identified and the date it was corrected;
c. a description of any maintenance and repairs performed; and
d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

(10) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

(11) The permit to install for this emissions unit, R005, was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN3 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN3 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: 2-ethoxy ethanol
TLV (ug/m3): 18,000
Maximum Hourly Emission Rate (lbs/hr): 3.27
Predicted 1 Hour Maximum Ground-level Concentration (ug/m3): 313.51
Maximum Acceptable Ground-level Concentration (MAGLC) (ug/m3): 428.6

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 minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, 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 still satisfy the "Air Toxic Policy":

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

e. documentation of the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

f. where 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.

e) Reporting Requirements

(1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this 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. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.

(2) If the facility (emissions units R003, R005 and P009) has a rolling, 12 month record that exceeds 24.9 tons of VOC from combined operations associated with aerospace manufacturing and rework operations the permittee shall submit the following:

a. Within 30 days after the end of that rolling, 12-month period in which the exceedance occurred, a notification to the Hamilton County Department of Environmental Services that the VOC emission limit was exceeded.

b. Within three months after the end of that rolling, 12-month period in which the exceedance occurred, a compliance plan to the Hamilton County Department of Environmental Services to comply with the presumptive RACT standards specified within USEPA document 453/R-97-004 " Control of Volatile Organic Compound Emissions from Aerospace Manufacturing and Rework Operations" (December 1997). Any divergence from the presumptive RACT standards and the model rule provided within that document shall be described at the time of the submittal of the 3-month compliance plan. Compliance with the presumptive RACT standards is to be achieved within 12 months after the rolling, 12-month period exceedance, unless otherwise requested by the permittee and approved by USEPA as a revision to Ohio's state implementation plan for ozone.

c. Exceeding the 24.9 TPY VOC/OC limit is a violation for each day of the last month of each 12 month period in which the 24.9 TPY limit is exceeded regardless of whether a compliance plan is submitted.

(3) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

(4) The permittee shall submit annual reports for emission unit R005 that contains the following information:

a. The annual VOC emissions from all coatings employed for coating metal parts, in tons per year.

b. The annual VOC emissions from all liquid organic cleanup material employed for coating metal parts, in tons per year.

The annual VOC emissions from all coatings and liquid organic materials employed for coating non-metal parts, in tons per year.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations:

Volatile Organic compound (VOC) emissions shall not exceed 40 pounds per day and 7.3 tons per year when coating non-metal parts.

Applicable Compliance Method:

Compliance shall be determined by the recordkeeping requirements of d)(2) and d)(3).

b. Emission Limitations:

The volatile organic compound (VOC) emission rate shall not exceed the following when coating metal parts:

i. 67 pounds per day and 12.2 tons per year from coatings.

ii. 8 pounds per day and 1.5 tons per year from liquid organic cleanup materials.

Applicable Compliance Method:

Compliance shall be determined by the recordkeeping requirements of d)(1) and d)(3).

c. Emission Limitation:

VOC emissions from emissions units R003, R005 and P009 combined, shall not exceed 24.9 tons per year based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be determined by the recordkeeping requirements of d)(3).

d. Emission Limitation:

The VOC content as applied of any coating employed shall not exceed 6.7 pounds per gallon, including water and exempt solvents.

Applicable Compliance Method:

Compliance shall be determined by the recordkeeping requirements of d)(1).

(2) Usage limitation:

The coating usage shall not exceed 10 gallons per day for coating metal parts in this emissions unit.

Applicable Compliance Method:

Compliance shall be determined by the recordkeeping requirements of d)(1).

(3) OAC rule 3745-21-10(B) shall be used to determine the VOC contents of the coatings, cleaning and washoff 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 ,cleaning or washoff material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for the coating ,cleaning or washoffmaterial,to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

g) Miscellaneous Requirements

(1) This Federally Enforceable Permit limits the potential emissions of organic compounds from the aerospace manufacturing and rework processes and associated cleaning and washoff processes located at this facility to no more than 24.9 TPY during any rolling, 12-month period. Should VOC/OC emissions from the aerospace manufacturing and rework processes and associated cleaning and washoff processes exceed 24.9 TPY during any rolling, 12-month period, this facility should notify the Hamilton County Department of Environmental Services within 30 days.