

Synthetic Minor Determination and/or Netting Determination
Permit To Install ENTER PTI NUMBER HERE

A. Source Description

ABX Air Inc. is an airborne freight company. The facility is located at 145 Hunter Drive in Wilmington, Clinton County. The emissions from this facility and Aviation Fuel, Inc. (0514010131) shall be combined when the facilities' PSD and Title V applicabilities are determined. ABX Air Inc. (ABX) provides maintenance coating and Aviation Fuel Inc. (AFI) has fueling capabilities for airplanes. ABX's Standard Industrial Code is 4513.

B. Facility Emissions and Attainment Status

The potential to emit of volatile organic compounds (VOCs) for this facility is currently 73.28 tons per year. The facility currently has two federally-enforceable PTIs. PTI 05-10145 issued to AFI has a VOC allowable of 19.78 TPY, and PTI 05-8360 issued to ABX Air Inc.(for K001, K003, K004, K005, K006, K007, K008, K009 and R001) has a VOC allowable of 47.28 TPY. However, there has been a proposed modification to PTI 05-8360 which will decrease allowable VOC emissions to 30.7 TPY. In addition, this proposed federally enforceable NSR permit, 05-10567, will limit VOC emissions to 17.82 TPY. Therefore, ABX and AFI will have a combined VOC emissions limitation of 68.26 TPY through Synthetic Minor NSR permits.

Furthermore, PTI 05-8360 specifies that HAP emissions from the emissions units at this facility shall not exceed 10 tons of any HAP and 25 tons of all combined HAPs as a rolling, 12-month summation. Since this is a maintenance shop and not a manufacturing process, calculating PTE for individual HAP emissions is very difficult. Therefore, the facility is required to maintain records of all HAP emissions for the entire facility to ensure compliance.

Wilmington is in Clinton County. Clinton County is designated as attainment for ozone and all criteria pollutants.

C. Source Emissions

ABX Air Inc. has agreed to restricting their combined emissions from emissions units K001, K004, K010, and K011 to 17.82 TPY VOC. In addition, ABX Air, Inc and Aviation Fuel, Inc (Facility ID 0514010131) have agreed to restrict their combined individual HAP and combined HAPs emissions to 10 TPY and 25 TPY, respectively. At these restricted levels, the total VOC, HAP and combined HAPs emissions will remain below Title V thresholds for both ABX and Aviation Fuel Inc. combined.

D. Conclusion

The material usage and emission limitations, along with the federally enforceable permit conditions, will restrict the facility's VOC emissions below Title V thresholds. The total VOC emissions in this PTI will restrict the emissions from emissions units K001, K004, K010, and K011 at this facility to 17.82 tons as a rolling, 12-month summation.



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Lazarus Gov. Center

**RE: DRAFT PERMIT TO INSTALL
CLINTON COUNTY**

CERTIFIED MAIL

Application No: 05-10567

DATE: 11/7/2000

ABX Air Inc
Robert L Hentrich Jr
145 Hunter Dr
Wilmington, OH 45177

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$800** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: USEPA
IN

SWDO

KY



**Permit To Install
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 05-10567

Application Number: 05-10567
APS Premise Number: 0514010124
Permit Fee: **To be entered upon final issuance**
Name of Facility: ABX Air Inc
Person to Contact: Robert L Hentrich Jr
Address: 145 Hunter Dr
Wilmington, OH 45177

Location of proposed air contaminant source(s) [emissions unit(s)]:

**145 Hunter Dr
Wilmington, Ohio**

Description of proposed emissions unit(s):

NEW MISCELLANEOUS METAL AND NON-METAL PARTS AND MODIFIED (TO AUTHORIZE COATING OF NON-METAL PARTS IN ADDITION TO METAL PARTS) SURFACE COATING OPERATIONS.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described emissions unit(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 and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

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 Related to Monitoring and Recordkeeping 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 quarterly, i.e., 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

ABX Air Inc

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facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed 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 prove to be inadequate 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 application must be made to the Director for the installation or modification of any other emissions unit(s).

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 thirty (30) days after commencing operation of the emissions unit(s) covered by this permit.

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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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	17.82

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
K001 - Hangar 1003 Aircraft Parts Paint Booth For Coating Of Metal And Non-Metal Parts (Terms in this permit supersede those identified in PTI 05-8360 issued on 3/19/97.)	OAC rule 3745-31-05(A)(3)	OAC rule 3745-21-09(U)(2)(b)
		OAC rule 3745-21-09(U)(2)(e)(iii)
		OAC rule 3745-21-07(G)(2)
		OAC rule 3745-35-07(B)

Applicable Emissions
Limitations/Control Measures

8.0 lbs VOC/gal of coating, including water and exempt solvents, as applied;

7.0 lbs VOC/gal of coating as a rolling, 12-month volume-weighted average, including water and exempt solvents, as applied;

7.5 lbs VOC/gal for all cleanup materials;

40.0 lbs VOC/day, not including cleanup materials, when coating metal parts or when coating non-metal parts and not employing photochemically reactive material;

The emissions limitations of this rule, when coating non-metal parts and employing any photochemically reactive material, also includes compliance with the emissions limitations of OAC rule 3745-21-07(G)(2);

5.6 tons VOC as a rolling, 12-month summation for all coatings and cleanup materials employed.

The emissions limitation specified by this rule for the exterior coating of airplanes is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).

The daily coating usage limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).

8 lbs OC/hr (average), including cleanup material, when coating nonmetal parts and employing any photochemically reactive material.

40 lbs OC/day, including cleanup material, when coating non-metal parts and employing any photochemically reactive material.

5.6 tons VOC as a rolling, 12-month summation for all coatings and cleanup materials employed.

2. Additional Terms and Conditions

2.a none

B. Operational Restrictions

1. The maximum daily coating usage for this emissions unit shall not exceed 5.0 gallons.
2. The maximum annual coating usage for this emissions unit shall not exceed 1,200 gallons, based upon a rolling, 12-month summation of the coating usage figures.

Given that the facility has been maintaining monthly records of coating usage for this emissions unit, compliance shall begin immediately following final issuance of this PTI. Therefore, no monthly restrictions for the first 12-months of operation, following the issuance of this permit, are required.

3. The maximum annual cleanup material usage for this emissions unit shall not exceed 360 gallons, based upon a rolling, 12-month summation of the cleanup material usage figures.

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Given that the facility has been maintaining monthly records of cleanup material usage for this emissions unit, compliance shall begin immediately following final issuance of this PTI. Therefore, no monthly restrictions for the first 12-months of operation, following the issuance of this permit, are required.

4. The maximum annual VOC content for coatings employed by this emissions unit shall not exceed 7.0 pounds per gallon based upon a rolling, 12-month volume-weighted average, including water and exempt solvents, as applied.

Given that the facility has been maintaining monthly records of coating usage and the VOC contents of the coatings employed for this emissions unit, compliance shall begin immediately following final issuance of this PTI.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. The name and identification number of each coating, as applied.
 - b. The VOC content of each coating (including water and exempt solvents), as applied.
 - c. The volume, in gallons, of each coating employed.
 - d. The total volume, in gallons, of all of the coatings employed.
 - e. The daily VOC emissions from the coatings employed.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

2. The permittee shall collect and record the following information for each day for this emissions unit when coating non-metal parts and employing any photochemically reactive material:
 - a. The name and identification of each coating and photochemically reactive cleanup material employed.
 - b. The volume, in gallons, of each coating and photochemically reactive cleanup material employed.

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PTI /

Emissions Unit ID: **K001**

Issued: To be entered upon final issuance

- c. The organic compound content of each coating and photochemically reactive cleanup material employed, in pounds per gallon.
- d. The total organic compound emissions rate for all coatings and photochemically reactive cleanup material employed, in pounds per day.
- e. The total number of hours the emissions unit was in operation.
- f. The average hourly organic compound emission rate for all coatings and photochemically reactive cleanup materials, i.e., (d)/(e), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically" are based upon OAC rule 3745-21-01(C)(5).]

- 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 volume, in gallons, of each cleanup material employed
 - c. The VOC content of each cleanup material employed.
- 4. The permittee shall collect and record the following information each month for this emissions unit:
 - a. The rolling, 12-month summation of the total volume, in gallons, of all cleanup material employed.
 - b. The rolling, 12-month summation of the total volume, in gallons, of all coatings employed.
 - c. The rolling, 12-month summation of the volume-weighted average VOC content of all coatings employed, including water and exempt solvents, as applied.
 - d. The combined VOC emissions from the coatings and cleanup materials employed.
 - e. The rolling, 12-month summation of VOC emissions from the coatings and cleanup materials employed.

5. The permit to install for this emissions unit K001 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. 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 SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 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: Styrene

TLV (mg/m³): 85.2

Maximum Hourly Emission Rate (lbs/hr): 40.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 1,783.0

MAGLC (ug/m³): 2,028.6

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic 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 applying 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.).

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PTI /

Emissions Unit ID: **K001**

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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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

6. 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:"
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. 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.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of noncomplying coatings (8.0 lbs VOC/gal) and/or any monthly record showing the use of noncomplying cleanup materials (7.5 lbs VOC/gal). 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 following the end of the calendar month.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing an exceedance of the daily coating usage limitation of 5.0 gallons. The permittee shall also notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing an exceedance of the daily VOC emissions limitation of 40.0 pounds. 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 following the end of the calendar month.
3. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. For the days during which a photochemically reactive material was employed for the coating of non-metal parts, an identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day .
 - b. For the days during which a photochemically reactive material was employed for the coating of non-metal parts, an identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

These quarterly deviation (excursion) reports are due by the date described in Part 1 - General Terms and Conditions of this permit under Section (A)(2).

4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month usage limitations for coatings (1,200 gallons) and cleanup materials (360 gallons). The permittee shall also submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month emissions limitation for volatile organic compounds (5.6 tons) and the rolling, 12-month volume-weighted average VOC content for coatings (7.0 lbs

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PTI

Emissions Unit ID: **K001**

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VOC/gal). These quarterly deviation (excursion) reports are due by the date described in Part 1 - General Terms and Conditions of this permit under Section (A)(2).

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PTI

Emissions Unit ID: **K001**

Issued: To be entered upon final issuance

E. Testing Requirements

Compliance with the emission limitations of these terms and conditions shall be determined in accordance with the following methods:

1. Emission Limitation -
8.0 pounds VOC per gallon of coating, including water and exempt solvents

Applicable Compliance Method -

Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings. In addition, compliance shall be demonstrated through the record keeping requirements as specified in Section C.1.

2. Emission Limitation -
7.0 pounds VOC per gallon of coating as a rolling, 12-month volume-weighted average, including water and exempt solvents, as applied.

Applicable Compliance Method -

Compliance shall be determined by the following method:

$$E = \frac{(Ea)(GPRa) + (Eb)(GPRb) + \dots (En)(GPRn)}{GPR \text{ total}}$$

where,

E = the rolling, 12-month summation of the volume-weighted average VOC content in lbs/gal of coating, including water and exempt solvents, as applied.

Ea...n = the VOC content of each individual coating, including water and exempt solvents, as applied.

GPRa...n = volume, in gallons, per rolling, 12-month summation of each individual coating, including water and exempt solvents, as applied.

GPR total = total volume, in gallons, of all coatings employed per rolling, 12-month summation.

3. Emission Limitation -
7.5 pounds VOC per gallon of cleanup material

Applicable Compliance Method -

Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the cleanup materials. In addition, compliance shall be demonstrated through the record keeping requirements as specified in Section C.3.

4. Emission Limitation -
40.0 pounds VOC per day, not including cleanup materials

Applicable Compliance Method -

Compliance shall be determined by multiplying the daily coating usage by the coating VOC content. Compliance shall also be demonstrated through the record keeping requirements as specified in Section C.1.

5. Emission Limitation -
8.0 pounds OC per hour, including cleanup materials, when coating non-metal parts and employing any photochemically reactive cleanup material.

Applicable Compliance Method -

When employing any photochemically reactive material to coat non-metal parts, compliance shall be determined by: a.) multiply the daily coating and cleanup material usage by their respective VOC contents; b.) sum the results; and c.) divide the results by the number of hours operated per day. Compliance shall also be demonstrated through the record keeping requirements as specified in Section C.2.

6. Emission Limitation -
40.0 pounds OC per day, including cleanup materials, when coating non-metal parts and employing any photochemically reactive cleanup material.

Applicable Compliance Method -

When employing any photochemically reactive material to coat non-metal parts, compliance shall be determined by multiplying the daily coating and cleanup material usage by their respective VOC contents and summing the results. Compliance shall also be demonstrated through the record keeping requirements as specified in Section C.2.

7. Emission Limitation -
5.6 tons of VOC as a rolling, 12-month summation

Applicable Compliance Method -

Compliance shall be determined through the record keeping requirements as specified in Section

ABX

PTI /

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Emissions Unit ID: **K001**

C.4.

F. Miscellaneous Requirements

This PTI modifies the previous PTI 05-08360 for emissions unit K001, which was issued on 3/19/97. The purpose of the modification is to provide increased flexibility for the permittee by completing the following modifications: include the coating of non-metal parts; increase daily coating usage from 3 to 5 gallons; revise the VOC content limitation for coatings to include water and exempt solvents; add a rolling, 12-month coating usage limitation of 1200 gallons; increase annual cleanup material usage from 120 to 360 gallons; increase the VOC content limitation for cleanup material from 6.9 to 7.5 pounds per gallon; add a rolling,

ABX

PTI

Emissions Unit ID: **K001**

Issued: To be entered upon final issuance

12-month volume-weighted average VOC content limitation for coatings of 7.0 lbs/gal; increase the annual allowable VOC emissions from 4.8 to 5.6 tons; and convert all annual limitations for coating and cleanup material usage and VOC emissions to rolling, 12-month summations.

ABX

PTI

Emissions Unit ID: **K004**

Issued: To be entered upon final issuance

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
K004 - Hangars 1003 And 1004 Miscellaneous Coating Operation For Metal And Non-Metal Parts (Terms in this permit supersede those of PTI 05-8360 issued on 3/19/97)	OAC rule 3745-31-05(A)(3)	OAC rule 3745-21-09(U)(2)(e)(iii)
		OAC rule 3745-21-07(G)(2)
		OAC rule 3745-35-07(B)
	OAC rule 3745-21-09(U)(2)(b)	

ABX

PTI

Emissions Unit ID: **K004**

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<u>Applicable Emissions Limitations/Control Measures</u>	
8.0 lbs VOC/gal of coating, including water and exempt solvents, as applied;	established pursuant to OAC rule 3745-31-05(A)(3).
7.5 lbs VOC/gal for all cleanup materials;	8 lbs OC/hr (average), including cleanup material, when coating nonmetal parts and employing any photochemically reactive material.
24.0 lbs VOC/day, not including cleanup materials, when coating metal parts or when coating non-metal parts and not employing photochemically reactive material;	40 lbs OC/day, including cleanup material, when coating non-metal parts and employing any photochemically reactive material.
The emissions limitations of this rule, when coating non-metal parts and employing any photochemically reactive material, also include compliance with the emissions limitations of OAC rule 3745-21-07(G)(2);	3.82 tons VOC as a rolling, 12-month summation for all coatings and cleanup materials employed.
3.82 tons VOC as a rolling, 12-month summation for all coatings and cleanup materials employed.	
The emissions limitation specified by this rule for the exterior coating of airplanes is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).	
The daily coating usage limitation specified by this rule is less stringent than the limitation	

2. Additional Terms and Conditions

2.a none

B. Operational Restrictions

1. The maximum daily coating usage for this emissions unit shall not exceed 3.0 gallons.
2. The maximum annual coating usage for this emissions unit shall not exceed 730 gallons, based upon a rolling, 12-month summation of the coating usage figures.

Given that the facility has been maintaining monthly records of coating usage for this emissions unit, compliance shall begin immediately following final issuance of this PTI. Therefore, no monthly restrictions for the first 12-months of operation, following the issuance of this permit, are required.

3. The maximum annual cleanup material usage for this emissions unit shall not exceed 240 gallons, based upon a rolling, 12-month summation of the cleanup material usage figures.

Given that the facility has been maintaining monthly records of cleanup material usage for this emissions unit, compliance shall begin immediately following final issuance of this PTI. Therefore, no monthly restrictions for the first 12-months of operation, following the issuance of this permit, are required.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. The name and identification number of each coating, as applied.
 - b. The VOC content of each coating (including water and exempt solvents), as applied.
 - c. The volume, in gallons, of each coating employed.
 - d. The total volume, in gallons, of all of the coatings employed.
 - e. The daily VOC emissions from the coatings employed.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

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2. The permittee shall collect and record the following information for each day for this emissions unit when coating non-metal parts and employing any photochemically reactive material:
 - a. The name and identification of each coating and photochemically reactive cleanup material employed.
 - b. The volume, in gallons, of each coating and photochemically reactive cleanup material employed.
 - c. The organic compound content of each coating and photochemically reactive cleanup material employed, in pounds per gallon.
 - d. The total organic compound emissions rate for all coatings and photochemically reactive cleanup material employed, in pounds per day.
 - e. The total number of hours the emissions unit was in operation.
 - f. The average hourly organic compound emission rate for all coatings and photochemically reactive cleanup materials, i.e., (d)/(e), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically" are based upon OAC rule 3745-21-01(C)(5).]

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 volume, in gallons, of each cleanup material employed
 - c. The VOC content of each cleanup material employed.
4. The permittee shall collect and record the following information each month for this emissions unit:
 - a. The rolling, 12-month summation of the total volume, in gallons, of all cleanup material employed.

Emissions Unit ID: **K004**

- b. The rolling, 12-month summation of the total volume, in gallons, of all coatings employed.
 - c. The combined VOC emissions from the coatings and cleanup materials employed.
 - d. The rolling, 12-month summation of VOC emissions from the coatings and cleanup materials employed.
5. The permit to install for this 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. 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 SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 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: Styrene

TLV (mg/m³): 85.2

Maximum Hourly Emission Rate (lbs/hr): 24.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 480.2

MAGLC (ug/m³): 2,028.6

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic 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 applying 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

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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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

- 6. 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:"
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. 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.

D. Reporting Requirements

- 1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of noncomplying coatings (8.0 lbs VOC/gal) and/or any monthly record showing the use of noncomplying cleanup materials (7.5 lbs VOC/gal). 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 following the end of the calendar month.
- 2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing an exceedance of the daily coating usage limitation

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of 3.0 gallons. The permittee shall also notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing an exceedance of the daily VOC emissions limitation of 24.0 pounds. 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 following the end of the calendar month.

3. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. For the days during which a photochemically reactive material was employed for the coating of non-metal parts, an identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day .
 - b. For the days during which a photochemically reactive material was employed for the coating of non-metal parts, an identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

These quarterly deviation (excursion) reports are due by the date described in Part 1 - General Terms and Conditions of this permit under Section (A)(2).

4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month usage limitations for coatings (730 gallons) and cleanup materials (240 gallons). The permittee shall also submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month emissions limitation for volatile organic compounds (3.82 tons). These quarterly deviation (excursion) reports are due by the date described in Part 1 - General Terms and Conditions of this permit under Section (A)(2).

E. Testing Requirements

Compliance with the emission limitations of these terms and conditions shall be determined in accordance with the following methods:

1. Emission Limitation -
8.0 pounds VOC per gallon of coating, including water and exempt solvents

Applicable Compliance Method -

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Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings. In addition, compliance shall be demonstrated through the record keeping requirements as specified in Section C.1.

2. Emission Limitation -
7.5 pounds VOC per gallon of cleanup material

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Applicable Compliance Method -

Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the cleanup materials. In addition, compliance shall be demonstrated through the record keeping requirements as specified in Section C.3.

3. Emission Limitation -
24.0 pounds VOC per day, not including cleanup materials

Applicable Compliance Method -

Compliance shall be determined by multiplying the daily coating usage by the coating VOC content. Compliance shall also be demonstrated through the record keeping requirements as specified in Section C.1.

4. Emission Limitation -
8.0 pounds OC per hour, including cleanup materials, when coating non-metal parts and employing any photochemically reactive cleanup material.

Applicable Compliance Method -

When employing any photochemically reactive material to coat non-metal parts, compliance shall be determined by: a.) multiply the daily coating and cleanup material usage by their respective VOC contents; b.) sum the results; and c.) divide the results by the number of hours operated per day. Compliance shall also be demonstrated through the record keeping requirements as specified in Section C.2.

5. Emission Limitation -
40.0 pounds OC per day, including cleanup materials, when coating non-metal parts and employing any photochemically reactive cleanup material.

Applicable Compliance Method -

When employing any photochemically reactive material to coat non-metal parts, compliance shall be determined by multiplying the daily coating and cleanup material usage by their respective VOC contents and summing the results. Compliance shall also be demonstrated through the record keeping requirements as specified in Section C.2.

6. Emission Limitation -
3.82 tons of VOC as a rolling, 12-month summation

Applicable Compliance Method -

Compliance shall be determined through the record keeping requirements as specified in Section

C.4.

F. Miscellaneous Requirements

This PTI modifies the previous PTI 05-08360 for emissions unit K004, which was issued on 3/19/97. The purpose of the modification is to provide increased flexibility for the permittee by completing the following modifications: include the coating of non-metal parts; revise the VOC content limitation for coating to include water and exempt solvents; include a rolling, 12-month coating usage limitation of 730 gallons; increase annual cleanup material usage from 120 to 240 gallons; increase the VOC content limitation for cleanup material from 6.9 to 7.5 pounds per gallon; decrease the annual allowable VOC emissions from 4.8 to 3.82 tons; and convert all annual limitations for coating and cleanup material usage and VOC emissions to rolling, 12-month summations.

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Emissions Unit ID: **K010**

Issued: To be entered upon final issuance

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
K010 - Hangar 1005 Miscellaneous Coating Operation For Metal And Non-Metal Parts	OAC rule 3745-31-05(A)(3)	OAC rule 3745-21-09(U)(2)(e)(iii)
		OAC rule 3745-21-07(G)(2)
		OAC rule 3745-35-07(B)
	OAC rule 3745-21-09(2)(b)	

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Applicable Emissions
Limitations/Control Measures

8.0 lbs VOC/gal of coating, including water and exempt solvents, as applied;

7.5 lbs VOC/gal for all cleanup materials;

24.0 lbs VOC/day, not including cleanup materials, when coating metal parts or when coating non-metal parts and not employing photochemically reactive material;

The emissions limitations of this rule, when coating non-metal parts and employing any photochemically reactive material, also include compliance with the emissions limitations of OAC rule 3745-21-07(G)(2);

4.3 tons VOC as a rolling, 12-month summation for all coatings and cleanup materials employed.

The emissions limitation specified by this rule for the exterior coating of airplanes is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).

The daily coating usage limitation specified by this rule is less stringent than the limitation

established pursuant to OAC rule 3745-31-05(A)(3).

8 lbs OC/hr (average), including cleanup material, when coating nonmetal parts and employing any photochemically reactive material.

40 lbs OC/day, including cleanup material, when coating non-metal parts and employing any photochemically reactive material.

4.3 tons VOC as a rolling, 12-month summation for all coatings and cleanup materials employed.

2. Additional Terms and Conditions

2.a none

B. Operational Restrictions

1. The maximum daily coating usage for this emissions unit shall not exceed 3.0 gallons.
2. The maximum annual coating usage for this emissions unit shall not exceed 730 gallons, based upon a rolling, 12-month summation of the coating usage figures.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the coating usage levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Coating Usage (gallons)</u>
1	61.0
1-2	122.0
1-3	183.0
1-4	244.0
1-5	305.0
1-6	366.0
1-7	427.0
1-8	488.0
1-9	549.0
1-10	610.0
1-11	671.0
1-12	730.0

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual coating usage limitation shall be based upon a rolling, 12-month summation of the coating usage figures.

3. The maximum annual cleanup material usage for this emissions unit shall not exceed 360 gallons, based upon a rolling, 12-month summation of the cleanup material usage figures.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the cleanup material usage levels specified in the following table:

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<u>Month(s)</u>	<u>Maximum Allowable Cumulative Coating Usage (gallons)</u>
1	30.0
1-2	60.0
1-3	90.0
1-4	120.0
1-5	150.0
1-6	180.0
1-7	210.0
1-8	240.0
1-9	270.0
1-10	300.0
1-11	330.0
1-12	360.0

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual cleanup material usage limitation shall be based upon a rolling, 12-month summation of the cleanup material usage figures.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. The name and identification number of each coating, as applied.
 - b. The VOC content of each coating (including water and exempt solvents), as applied.
 - c. The volume, in gallons, of each coating employed.
 - d. The total volume, in gallons, of all of the coatings employed.
 - e. The daily VOC emissions from the coatings employed.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

2. The permittee shall collect and record the following information for each day for this emissions unit when coating non-metal parts and employing any photochemically reactive material:

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- a. The name and identification of each coating and photochemically reactive cleanup material employed.
- b. The volume, in gallons, of each coating and photochemically reactive cleanup material employed.
- c. The organic compound content of each coating and photochemically reactive cleanup material employed, in pounds per gallon.
- d. The total organic compound emissions rate for all coatings and photochemically reactive cleanup material employed, in pounds per day.
- e. The total number of hours the emissions unit was in operation.
- f. The average hourly organic compound emission rate for all coatings and photochemically reactive cleanup materials, i.e., (d)/(e), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically" are based upon OAC rule 3745-21-01(C)(5).]

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 volume, in gallons, of each cleanup material employed
 - c. The VOC content of each cleanup material employed.
4. The permittee shall collect and record the following information each month for this emissions unit:
 - a. The rolling, 12-month summation of the total volume, in gallons, of all cleanup material employed.
 - b. The rolling, 12-month summation of the total volume, in gallons, of all coatings employed.
 - c. The combined VOC emissions from the coatings and cleanup materials employed.

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- d. The rolling, 12-month summation of VOC emissions from the coatings and cleanup materials employed.
5. The permit to install for this emissions unit K010 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. 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 SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 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: Styrene

TLV (mg/m³): 85.2

Maximum Hourly Emission Rate (lbs/hr): 24.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 559.6

MAGLC (ug/m³): 2,028.6

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic 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 applying 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

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- 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

6. 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:"
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. 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.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of noncomplying coatings (8.0 lbs VOC/gal) and/or any monthly record showing the use of noncomplying cleanup materials (7.5 lbs VOC/gal). 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 following the end of the calendar month.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing an exceedance of the daily coating usage limitation of 3.0 gallons. The permittee shall also notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing an exceedance of the daily VOC emissions limitation of 24.0 pounds. 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 following the end of the calendar month.
3. The permittee shall submit quarterly deviation (excursion) reports which include the following

information:

- a. For the days during which a photochemically reactive material was employed for the coating of non-metal parts, an identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day .
- b. For the days during which a photochemically reactive material was employed for the coating of non-metal parts, an identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

These quarterly deviation (excursion) reports are due by the date described in Part 1 - General Terms and Conditions of this permit under Section (A)(2).

4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month usage limitations for coatings (730 gallons) and cleanup materials (360 gallons). The permittee shall also submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month emissions limitation for volatile organic compounds (4.3 tons). These quarterly deviation (excursion) reports are due by the date described in Part 1 - General Terms and Conditions of this permit under Section (A)(2).

E. Testing Requirements

Compliance with the emission limitations of these terms and conditions shall be determined in accordance with the following methods:

1. Emission Limitation -
8.0 pounds VOC per gallon of coating, including water and exempt solvents

Applicable Compliance Method -

Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings. In addition, compliance shall be demonstrated through the record keeping requirements as specified in Section C.1.

2. Emission Limitation -
7.5 pounds VOC per gallon of cleanup material

Applicable Compliance Method -

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Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the cleanup materials. In addition, compliance shall be demonstrated through the record keeping requirements as specified in Section C.3.

3. Emission Limitation -
24.0 pounds VOC per day, not including cleanup materials

Applicable Compliance Method -

Compliance shall be determined by multiplying the daily coating usage by the coating VOC content. Compliance shall also be demonstrated through the record keeping requirements as specified in Section C.1.

4. Emission Limitation -
8.0 pounds OC per hour, including cleanup materials, when coating non-metal parts and employing any photochemically reactive cleanup material.

Applicable Compliance Method -

When employing any photochemically reactive material to coat non-metal parts, compliance shall be determined by: a.) multiply the daily coating and cleanup material usage by their respective VOC contents; b.) sum the results; and c.) divide the results by the number of hours operated per day. Compliance shall also be demonstrated through the record keeping requirements as specified in Section C.2.

5. Emission Limitation -
40.0 pounds OC per day, including cleanup materials, when coating non-metal parts and employing any photochemically reactive cleanup material.

Applicable Compliance Method -

When employing any photochemically reactive material to coat non-metal parts, compliance shall be determined by multiplying the daily coating and cleanup material usage by their respective VOC contents and summing the results. Compliance shall also be demonstrated through the record keeping requirements as specified in Section C.2.

6. Emission Limitation -
4.3 tons of VOC as a rolling, 12-month summation

Applicable Compliance Method -

Compliance shall be determined through the record keeping requirements as specified in Section C.4.

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PTI Application 05-10567
Issue

Facility ID: 0514010124

Emissions Unit ID: **K010**

F. Miscellaneous Requirements

none

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Emissions Unit ID: **K011**

Issued: To be entered upon final issuance

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>
K011 - Base Shop Wheels And Brakes, #2 Paint Booth For Coating Of Metal And Non-Metal Parts (This emissions unit was previously a part of emissions unit K006. Terms in this permit supersede those of PTI 05-8360 issued on 3/19/97.)	OAC rule 3745-31-05(A)(3)
	OAC rule 3745-21-09(U)(2)(e)(iii)
	OAC rule 3745-21-07(G)(2)
	OAC rule 3745-35-07(B)
	OAC rule 3745-21-09(U)(2)(b)

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<u>Applicable Emissions Limitations/Control Measures</u>	established pursuant to OAC rule 3745-31-05(A)(3).
8.0 lbs VOC/gal of coating, including water and exempt solvents, as applied;	8 lbs OC/hr (average), including cleanup material, when coating nonmetal parts and employing any photochemically reactive material.
7.5 lbs VOC/gal for all cleanup materials;	40 lbs OC/day, including cleanup material, when coating non-metal parts and employing any photochemically reactive material.
40.0 lbs VOC/day, not including cleanup materials, when coating metal parts or when coating non-metal parts and not employing photochemically reactive material;	4.1 tons VOC as a rolling, 12-month summation for all coatings and cleanup materials employed.
The emissions limitations of this rule, when coating non-metal parts and employing any photochemically reactive material, also include compliance with the emissions limitations of OAC rule 3745-21-07(G)(2);	
4.1 tons VOC as a rolling, 12-month summation for all coatings and cleanup materials employed.	
The emissions limitation specified by this rule for the exterior coating of airplanes is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).	
The daily coating usage limitation specified by this rule is less stringent than the limitation	

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Emissions Unit ID: **K011**

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2. Additional Terms and Conditions

2.a none

B. Operational Restrictions

1. The maximum daily coating usage for this emissions unit shall not exceed 5.0 gallons.
2. The maximum annual coating usage for this emissions unit shall not exceed 850 gallons, based upon a rolling, 12-month summation of the coating usage figures.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the coating usage levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Coating Usage (gallons)</u>
1	71.0
1-2	142.0
1-3	213.0
1-4	284.0
1-5	355.0
1-6	426.0
1-7	497.0
1-8	568.0
1-9	639.0
1-10	710.0
1-11	781.0
1-12	850.0

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual coating usage limitation shall be based upon a rolling, 12-month summation of the coating usage figures.

3. The maximum annual cleanup material usage for this emissions unit shall not exceed 180 gallons, based upon a rolling, 12-month summation of the cleanup material usage figures.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the cleanup material usage levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Coating Usage (gallons)</u>
1	15.0
1-2	30.0
1-3	45.0
1-4	60.0
1-5	75.0
1-6	90.0
1-7	105.0
1-8	120.0
1-9	135.0
1-10	150.0
1-11	165.0
1-12	180.0

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual cleanup material usage limitation shall be based upon a rolling, 12-month summation of the cleanup material usage figures.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. The name and identification number of each coating, as applied.
 - b. The VOC content of each coating (including water and exempt solvents), as applied.
 - c. The volume, in gallons, of each coating employed.
 - d. The total volume, in gallons, of all of the coatings employed.
 - e. The daily VOC emissions from the coatings employed.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

2. The permittee shall collect and record the following information for each day for this emissions unit when coating non-metal parts and employing any photochemically reactive material:

ABX

PTI /

Emissions Unit ID: **K011**

Issued: To be entered upon final issuance

- a. The name and identification of each coating and photochemically reactive cleanup material employed.
- b. The volume, in gallons, of each coating and photochemically reactive cleanup material employed.
- c. The organic compound content of each coating and photochemically reactive cleanup material employed, in pounds per gallon.
- d. The total organic compound emissions rate for all coatings and photochemically reactive cleanup material employed, in pounds per day.
- e. The total number of hours the emissions unit was in operation.
- f. The average hourly organic compound emission rate for all coatings and photochemically reactive cleanup materials, i.e., (d)/(e), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically" are based upon OAC rule 3745-21-01(C)(5).]

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 volume, in gallons, of each cleanup material employed
 - c. The VOC content of each cleanup material employed.
4. The permittee shall collect and record the following information each month for this emissions unit:
 - a. The rolling, 12-month summation of the total volume, in gallons, of all cleanup material employed.
 - b. The rolling, 12-month summation of the total volume, in gallons, of all coatings employed.
 - c. The combined VOC emissions from the coatings and cleanup materials employed.

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PTI

Emissions Unit ID: **K011**

Issued: To be entered upon final issuance

- d. The rolling, 12-month summation of VOC emissions from the coatings and cleanup materials employed.
5. The permit to install for this emissions unit K011 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. 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 SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 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: Styrene

TLV (mg/m³): 85.2

Maximum Hourly Emission Rate (lbs/hr): 18.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 1092.0

MAGLC (ug/m³): 2,028.6

Pollutant: Toluene

TLV (mg/m³): 188.0

Maximum Hourly Emission Rate (lbs/hr): 40.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 2,406.0

MAGLC (ug/m³): 4,476.0

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic 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 applying 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

6. 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:"
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. 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.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of noncomplying coatings (8.0 lbs VOC/gal) and/or any monthly record showing the use of noncomplying cleanup materials (7.5 lbs VOC/gal). 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 following the end of the calendar month.

ABX

PTI /

Emissions Unit ID: **K011**

Issued: To be entered upon final issuance

2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing an exceedance of the daily coating usage limitation of 5.0 gallons. The permittee shall also notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing an exceedance of the daily VOC emissions limitation of 40.0 pounds. 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 following the end of the calendar month.
3. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. For the days during which a photochemically reactive material was employed for the coating of non-metal parts, an identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day .
 - b. For the days during which a photochemically reactive material was employed for the coating of non-metal parts, an identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

These quarterly deviation (excursion) reports are due by the date described in Part 1 - General Terms and Conditions of this permit under Section (A)(2).

4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month usage limitations for coatings (850 gallons) and cleanup materials (180 gallons). The permittee shall also submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month emissions limitation for volatile organic compounds (4.1 tons). These quarterly deviation (excursion) reports are due by the date described in Part 1 - General Terms and Conditions of this permit under Section (A)(2).

E. Testing Requirements

Compliance with the emission limitations of these terms and conditions shall be determined in accordance with the following methods:

1. Emission Limitation -
8.0 pounds VOC per gallon of coating, including water and exempt solvents

Applicable Compliance Method -
Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings. In addition, compliance shall be demonstrated through the record keeping requirements as specified in Section C.1.
2. Emission Limitation -
7.5 pounds VOC per gallon of cleanup material

Applicable Compliance Method -
Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the cleanup materials. In addition, compliance shall be demonstrated through the record keeping requirements as specified in Section C.3.
3. Emission Limitation -
40.0 pounds VOC per day, not including cleanup materials

Applicable Compliance Method -
Compliance shall be determined by multiplying the daily coating usage by the coating VOC content. Compliance shall also be demonstrated through the record keeping requirements as specified in Section C.1.
4. Emission Limitation -
8.0 pounds OC per hour, including cleanup materials, when coating non-metal parts and employing any photochemically reactive cleanup material.

Applicable Compliance Method -
When employing any photochemically reactive material to coat non-metal parts, compliance shall be determined by: a.) multiply the daily coating and cleanup material usage by their respective VOC contents; b.) sum the results; and c.) divide the results by the number of hours operated per day. Compliance shall also be demonstrated through the record keeping requirements as specified in Section C.2.
5. Emission Limitation -
40.0 pounds OC per day, including cleanup materials, when coating non-metal parts and employing any photochemically reactive cleanup material.

Applicable Compliance Method -

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Emissions Unit ID: **K011**

Issued: To be entered upon final issuance

When employing any photochemically reactive material to coat non-metal parts, compliance shall be determined by multiplying the daily coating and cleanup material usage by their respective VOC contents and summing the results. Compliance shall also be demonstrated through the record keeping requirements as specified in Section C.2.

6. Emission Limitation -
4.1 tons of VOC as a rolling, 12-month summation

Applicable Compliance Method -

Compliance shall be determined through the record keeping requirements as specified in Section C.4.

F. Miscellaneous Requirements

This PTI modifies the previous PTI 05-08360 for emissions unit K006, which was issued on 3/19/97. The purpose of the modification is to separate Base Shop Wheels and Brakes Paint Booths #2 from emissions unit K006, and assign Paint Booth #2 emissions unit identification K011. In addition, this modification to Paint Booth #2 provides increased flexibility for the permittee through the following revisions: includes the coating of non-metal parts; revises the VOC content limitation for coating to include water and exempt solvents; includes a rolling, 12-month coating usage limitation of 850 gallons and cleanup usage limitation of 180 gallons; increases the VOC content limitation for cleanup material from 6.9 to 7.5 pounds per gallon; and include a rolling, 12-month VOC emissions limitation of 4.1 tons.

NEW SOURCE REVIEW FORM B

PTI Number: 05-10567 Facility ID: 0514010124

FACILITY NAME ABX Air Inc
FACILITY

Emissions Unit ID: **K011**

METAL PARTS IN ADDITION TO METAL PARTS) SURFACE COATING OPERATIONS.

SIC CODE 4513 SCC CODE 4-02-022-01/4-02-02 5-01 EMISSIONS UNIT ID K001

EMISSIONS UNIT DESCRIPTION Hangar 1003 Aircraft Parts Paint Booth For Coating Of Metal And Non-Metal Parts (Terms in this permit supersede those identified in PTI 05-8360 issued on 3/19/97.)

DATE INSTALLED To be modified after permit issuance, but originally installed January 1980

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	attainment	8 lbs/hr, 40 lbs/day	5.6	8 lbs/hr, 40 lbs/day	5.6
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 BAT is compliance with applicable emissions limitations, VOC content limitations for both coatings (maximum of 8.0 lbs/gal with water and exempt solvents, and a rolling 12-month VOC content limitation of 7.0 lbs/gal with water and exempt solvents) and cleanup materials (7.5 lbs/gal), daily coating usage limitation (5.0 gallons), rolling 12-month coating and cleanup usage limitations (1200 gallons and 360 gallons, respectively), record keeping and reporting requirements.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes

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

NEW SOURCE REVIEW FORM B

PTI Number:
05-10567

Facility ID: 0514010124

FACILITY NAME ABX Air Inc
FACILI

Emissions Unit ID: **K011**

METAL PARTS IN ADDITION TO
METAL PARTS) SURFACE COATING
OPERATIONS.

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*? X YES NO

IDENTIFY THE AIR CONTAMINANTS: Styrene

NEW SC

PTI Num

FACILITY

Emissions Unit ID: **K011**

FACILITY DESCRIPTION NEW MISCELLANEOUS METAL AND NON-METAL PARTS AND MODIFIED (TO AUTHORIZE COATING OF NON-METAL PARTS IN ADDITION TO METAL PARTS) SURFACE COATING OPERATIONS.

CITY/TWP Wilmington

SIC CODE 4513 SCC CODE 4-02-024-01 EMISSIONS UNIT ID K004

EMISSIONS UNIT DESCRIPTION Hangars 1003 And 1004 Miscellaneous Coating Operation For Metal And Non-Metal Parts (Terms in this permit supersede those of PTI 05-8360 issued on 3/19/97)

DATE INSTALLED To be modified after permit issuance, but originally installed January 1989

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	attainment	8 lbs/hr, 40 lbs/day	3.82	8 lbs/hr, 40 lbs/day	3.82
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 BAT is compliance with applicable emissions limitations, VOC content limitations for both coatings (maximum of 8.0 lbs/gal with water and exempt solvents) and cleanup materials (7.5 lbs/gal), daily coating usage limitation (3.0 gallons), rolling 12-month coating and cleanup usage limitations (730 gallons and 240 gallons, respectively), record keeping and reporting requirements.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes

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

NEW SOURCE REVIEW FORM B

PTI Number: 05-10567

Facility ID: 0514010124

FACILITY NAME ABX Air Inc

FACILITY DESCRIPTION NEW MISCELLANEOUS METAL AND CITY/TWP Wilmington

Emissions Unit ID: **K011**

METAL PARTS) SURFACE COATING
OPERATIONS.

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*? X YES NO

IDENTIFY THE AIR CONTAMINANTS: Styrene

NEW SC

PTI Num

FACILITY

Emissions Unit ID: **K011**

FACILITY DESCRIPTION NEW MISCELLANEOUS METAL AND NON-METAL PARTS AND MODIFIED (TO AUTHORIZE COATING OF NON-METAL PARTS IN ADDITION TO METAL PARTS) SURFACE COATING OPERATIONS.

CITY/TWP Wilmington

SIC CODE 4513 SCC CODE 4-02-024-01 EMISSIONS UNIT ID K010

EMISSIONS UNIT DESCRIPTION Hangar 1005 Miscellaneous Coating Operation For Metal And Non-Metal Parts

DATE INSTALLED To be installed after permit issuance, originally installed on January 1994

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	attainment	8 lbs/hr, 40 lbs/day	4.3	8 lbs/hr, 40 lbs/day	4.3
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 BAT is compliance with applicable emissions limitations, VOC content limitations for both coatings (maximum of 8.0 lbs/gal with water and exempt solvents) and cleanup materials (7.5 lbs/gal), daily coating usage limitation (3.0 gallons), rolling 12-month coating and cleanup usage limitations (730 gallons and 360 gallons, respectively), record keeping and reporting requirements.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes

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

NEW SC

PTI Num

FACILITY

Emissions Unit ID: **K011** _____

FACILITY DESCRIPTION	NEW MISCELLANEOUS METAL AND NON-METAL PARTS AND MODIFIED (TO AUTHORIZE COATING OF NON-METAL PARTS IN ADDITION TO METAL PARTS) SURFACE COATING OPERATIONS.	CITY/TWP	Wilmington
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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*? x YES NO

IDENTIFY THE AIR CONTAMINANTS: Styrene

NEW SOURCE REVIEW FORM B

PTI Number: 05-10567

Facility ID: 0514010124

FACILITY NAME ABX Air Inc

FACILITY DESCRIPTION NEW MISCELLANEOUS METAL AND CITY/TWP Wilmington

Emissions Unit ID: **K011**METAL PARTS) SURFACE COATING
OPERATIONS.

SIC CODE	4513	SCC CODE	4-02-025-01/4-02-02 2-01	EMISSIONS UNIT ID	K011
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EMISSIONS UNIT DESCRIPTION Base Shop Wheels And Brakes, #2 Paint Booth For Coating Of Metal And Non-Metal Parts (This emissions unit was previously a part of emissions unit K006. Terms in this permit supersede those of PTI 05-8360 issued on 3/19/97.)

DATE INSTALLED	To be modified after permit issuance, originally installed on January 1995
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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	attainment	8 lbs/hr, 40 lbs/day	4.1	8 lbs/hr, 40 lbs/day	4.1
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?

60 **NEW SC**

PTI Num

FACILITY

Emissions Unit ID: **K011** _____

FACILITY DESCRIPTION NEW MISCELLANEOUS METAL AND
NON-METAL PARTS AND MODIFIED
(TO AUTHORIZE COATING OF NON-
METAL PARTS IN ADDITION TO
METAL PARTS) SURFACE COATING
OPERATIONS.

CITY/TWP Wilmington

Enter Determination BAT is compliance with applicable emissions limitations, VOC content limitations for both coatings (maximum of 8.0 lbs/gal with water and exempt solvents) and cleanup materials (7.5 lbs/gal), daily coating usage limitation (5.0 gallons), rolling 12-month coating and cleanup usage limitations (850 gallons and 180 gallons, respectively), record keeping and reporting requirements.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes

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*? x YES NO

IDENTIFY THE AIR CONTAMINANTS: Styrene and Toluene

6 NEW SC

PTI Num

FACILITY

Emissions Unit ID: **K011** _____

FACILITY DESCRIPTION NEW MISCELLANEOUS METAL AND NON-METAL PARTS AND MODIFIED (TO AUTHORIZE COATING OF NON-METAL PARTS IN ADDITION TO METAL PARTS) SURFACE COATING OPERATIONS.

CITY/TWP Wilmington

Ohio EPA Permit to Install Information Form Please describe below any documentation which is being submitted with this recommendation (must be sent the same day). Electronic items should be submitted with the e-mail transmitting the PTI terms, and in software that CO can utilize. If mailing any hard copy, this section must be printed as a cover page. All items must be clearly labeled indicating the PTI name and number. Submit **hard copy items to Pam McGraner, AQM&P, DAPC, Central Office, and electronic files to airpti@epa.state.oh.us**

Please fill out the following. If the checkbox does not work, replace it with an 'X'

	<u>Electronic</u>	<u>Additional information File Name Convention (your PTI # plus this letter)</u>	<u>Hard Copy</u>	<u>None</u>
<u>Calculations (required)</u>	<input checked="" type="checkbox"/>	0510567c.wpd	<input type="checkbox"/>	
<u>Modeling form/results</u>	<input checked="" type="checkbox"/>	0510567s1 thru s5.wpd	<input type="checkbox"/>	<input type="checkbox"/>
<u>PTI Application (complete or partial)*</u>	<input type="checkbox"/>	0000000a.wpd	<input type="checkbox"/>	<input type="checkbox"/>
<u>BAT Study</u>	<input type="checkbox"/>	0000000b.wpd	<input type="checkbox"/>	<input type="checkbox"/>
<u>Other/misc.</u>	<input type="checkbox"/>	0000000t.wpd	<input type="checkbox"/>	<input type="checkbox"/>

* Mandatory for netting, PSD, nonattainment NSR, 112(g), 21-07(G)(9)(g) and 21-09(U)(2)(f) - 2 complete copies.

Please complete (see comment bubble to the left for additional instructions):

NSR Discussion

On September 21, 2000, ABX Air, Inc. submitted a request for additional flexibility for their maintenance systems, and more specifically their coating operations. The need for additional flexibility was caused by an increase in business and FAA requirements. The facility's request is being managed by two separate permit actions. The first was an Administrative Modification to PTI 05-08360. The second is a new permit to install, PTI 05-10567, to modify emissions unit K001 and K004, and add two new emissions units K010 and K011. Emissions unit K011, the Base Shop Wheels and Brakes Paint Booth #2, was formerly permitted by 05-08360 as a part of emissions unit K006. This permit along with the proposed Administrative Modification for PTI 05-08360, has split-up K006 and K011.

Each of the emissions units proposed by PTI 05-10567 will be coating metal and non-metal parts. The coatings and cleanup material employed are photochemically reactive materials. Consequently, the applicable rules include OAC rules 3745-21-07(G)(2) and -21-09(U). To demonstrate compliance with OAC rule 3745-21-07(G)(2), the permittee is required to maintain separate records when coating any non-metal parts with photochemically reactive materials including cleanup materials. To maintain compliance with OAC rule 3745-21-09(U), the permittee will employ less than 10 gallons of coating each day for coating miscellaneous metal parts not including cleanup materials.

NEW SOURCE REVIEW FORM B

PTI Number: 05-10567

Facility ID: 0514010124

FACILITY NAME ABX Air Inc

FACILITY DESCRIPTION NEW MISCELLANEOUS METAL AND CITY/TWP Wilmington

Emissions Unit ID: **K011**METAL PARTS) SURFACE COATING
OPERATIONS.

The company is requesting that this permit be Federally Enforceable, and therefore issued as a Synthetic Minor Permit. To ensure enforceability the permittee is required to maintain compliance with coating and cleanup material usage limitations as a rolling, 12-month summation.

Fee Assessment:

K001: PWR of 1 to 1000 lbs/hr; fee = \$200

K004: PWR of 1 to 1000 lbs/hr; fee = \$200

K010: PWR of 1 to 1000 lbs/hr; fee = \$200

K011: PWR of 1 to 1000 lbs/hr; fee = \$200

Total \$600.00

Please complete for these type permits (For PSD/NSR Permit, place mouse over this text):

Synthetic Minor Determination and/or **Netting Determination**
Permit To Install ENTER PTI NUMBER HERE

A. Source Description

ABX Air Inc. is an airborne freight company. The facility is located at 145 Hunter Drive in Wilmington, Clinton County. The emissions from this facility and Aviation Fuel, Inc. (0514010131) shall be combined when the facilities' PSD and Title V applicabilities are determined. ABX Air Inc. (ABX) provides maintenance coating and Aviation Fuel Inc. (AFI) has fueling capabilities for airplanes. ABX's Standard Industrial Code is 4513.

B. Facility Emissions and Attainment Status

The potential to emit of volatile organic compounds (VOCs) for this facility is currently 73.28 tons per year. The facility currently has two federally-enforceable PTIs. PTI 05-10145 issued to AFI has a VOC allowable of 19.78 TPY, and PTI 05-8360 issued to ABX Air Inc.(for K001, K003, K004, K005, K006, K007, K008, K009 and R001) has a VOC allowable of 47.28 TPY. However, there has been a proposed modification to PTI 05-8360 which will decrease allowable VOC emissions to 30.7 TPY. In addition, this proposed federally enforceable NSR permit, 05-10567, will limit VOC emissions to 17.82 TPY. Therefore, ABX and AFI will have a combined VOC emissions limitation of 68.26 TPY through Synthetic Minor NSR permits.

Furthermore, PTI 05-8360 specifies that HAP emissions from the emissions units at this facility shall not exceed 10 tons of any HAP and 25 tons of all combined HAPs as a rolling, 12-month summation. Since this is a maintenance shop and not a manufacturing process, calculating PTE for individual HAP emissions is very difficult. Therefore, the facility is required to maintain records of all HAP emissions for the entire facility to

NEW SOURCE REVIEW FORM B

PTI Number: 05-10567

Facility ID: 0514010124

FACILITY NAME ABX Air Inc

FACILITY DESCRIPTION NEW MISCELLANEOUS METAL AND CITY/TWP Wilmington

Emissions Unit ID: **K011**

METAL PARTS) SURFACE COATING
OPERATIONS.

ensure compliance.

Wilmington is in Clinton County. Clinton County is designated as attainment for ozone and all criteria pollutants.

C. Source Emissions

ABX Air Inc. has agreed to restricting their combined emissions from emissions units K001, K004, K010, and K011 to 17.82 TPY VOC. In addition, ABX Air, Inc and Aviation Fuel, Inc (Facility ID 0514010131) have agreed to restrict their combined individual HAP and combined HAPs emissions to 10 TPY and 25 TPY, respectively. At these restricted levels, the total VOC, HAP and combined HAPs emissions will remain below Title V thresholds for both ABX and Aviation Fuel Inc. combined.

D. Conclusion

The material usage and emission limitations, along with the federally enforceable permit conditions, will restrict the facility's VOC emissions below Title V thresholds. The total VOC emissions in this PTI will restrict the emissions from emissions units K001, K004, K010, and K011 at this facility to 17.82 tons as a rolling, 12-month summation.

PLEASE PROVIDE ADDITIONAL NOTES OR COMMENTS AS NECESSARY:

NONE

Please complete:

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

Pollutant
VOC

Tons Per Year
17.82