



State of Ohio Environmental Protection Agency

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

CERTIFIED MAIL

Street Address:

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

Mailing Address:

Lazarus Gov.
Center

Application No: 08-04233

DATE: 1/30/2001

DAP Inc
Matthew Stewart
2400 Boston St Ste 200
Baltimore, MD 21224-0000

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 **\$11200** 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
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA RAPCA IN Miami Valley Reg Plan Com



Permit To Install

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Terms and Conditions

DRAFT PERMIT TO INSTALL 08-04233

Application Number: 08-04233
APS Premise Number: 0855130356
Permit Fee: **To be entered upon final issuance**
Name of Facility: DAP Inc
Person to Contact: Matthew Stewart
Address: 2400 Boston St Ste 200
Baltimore, MD 21224-0000

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

875 N Third St
Tipp City, Ohio

Description of proposed emissions unit(s):

adhesive and paint packaging lines and paint mixer; 3 powdered mineral bag dump stations.

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

DAP Inc

Facility ID: 0855130356

PTI Application: 08-04233

Issued: To be entered upon final issuance

Part I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install General Terms and Conditions

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. 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.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written 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. See B.11 below if no deviations occurred during the quarter.

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- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. 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, i.e., upset, 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. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

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A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. 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 request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. 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.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit

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shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

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10. Permit To Operate Application

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. 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 source(s) covered by this permit.

11. 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.

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B. State Only Enforceable 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 of state-only enforceable 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 state-only required 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. 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.

4. 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.

5. Termination of Permit To Install

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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.

6. Construction of New Sources(s)

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

7. 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.

8. 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).

9. Construction Compliance Certification

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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.

10. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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.

C. 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>
OC	91.41
Particulates	0.90

DAP Inc**Facility ID: 0855130356****PTI Application: 08-04233****Issued: To be entered upon final issuance****Part II - FACILITY SPECIFIC TERMS AND CONDITIONS****A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions**

1. Within 120 days after promulgation of 40 CFR 63 Subpart FFFF, Misc. Organic NESHAP, the permittee shall submit an Initial Notification Report which certifies whether or not the permittee is subject to the promulgated standard. If the permittee is subject to the final standard, the following information shall also be included in the Initial Notification Report:
 - a. the name and mailing address of the permittee;
 - b. the physical location of the source if it is different from the mailing address;
 - c. identification of the relevant MACT standard and the permittee's compliance date;
 - d. a brief description of the nature, design, size, and method of operation of the source, including the operating design capacity, and an identification of each emission point of each hazardous air pollutant;
 - e. a statement of whether or not the permittee is a major source or an area source according to the promulgated MACT.

2. Within 60 days following completion of the required compliance demonstration activity specified in the 40 CFR 63 Subpart FFFF, the permittee shall submit a notification of compliance status that contains the following information:
 - a. the methods used to determine compliance;
 - b. the results of any performance tests, opacity or visible emission observations, continuous monitoring systems (CMS) performance evaluations, and/or other monitoring procedures or methods that were conducted;
 - c. the methods that will be used for determining continuous compliance, including a description of monitoring and reporting requirements and test methods;
 - d. the type and quantity of hazardous air pollutants emitted by the source, reported in units and averaging times in accordance with the test methods specified in 40 CFR 63 Subpart FFFF;
 - e. an analysis demonstrating whether the affected source is a major source or an area source;
 - f. a description of the air pollution control equipment or method for each emission point, including each control device or method for

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each hazardous air pollutant and the control efficiency (percent) for each control device or method; and

- g. a statement of whether or not the permittee has complied with the requirements of 40 CFR 63 Subpart FFFF.

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

DAP I

PTI A

Emissions Unit ID: P005

Issued: To be entered upon final issuance

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. 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>	<u>Applicable Emissions Limitations/Control Measures</u>
P005 - Let-down Paint Tanks 220, 221, 222, 227, and 229	OAC rule 3745-31-05(A)(3)	2.31 lbs organic compounds (OC)/hr, 17.28 lbs OC/day, and 3.20 TPY OC
	OAC rule 3745-21-07(G)(2)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a None.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall collect and record the following information on a daily basis for each let-down paint tank identified as Tank 220, Tank 221, Tank 222, Tank 227, and Tank 229:
 - a. the company identification for each batch of product mixed/stored;
 - b. the number of hours of operation;
 - c. the number of gallons mixed/stored of each product;

Emissions Unit ID: P005

- d. the number of batches of each product mixed/stored;
- e. the calculated vapor pressure (psia) of the product;
- f. the calculated vapor molecular weight (lb/lb-mole);
- g. the average temperature of each let-down tank when in operation (R)**;
- h. the open area of each tank (square meters);
- i. partial pressure of each VOC in vessel headspace (psia);
- j. the calculated gas vapor pressure in vessel (psia);
- k. average initial gas temperature and final gas temperature**;
- l. the determination of the displacement, evaporation, point source, and heat up losses for each product mixed/stored in each let-down tank, in accordance with the formulas and assumptions given in the "US EPA Emission Inventory Improvement Program Volume II: Chapter 8, Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Facilities", March 1998, for each product/day*;
- m. the total calculated OC emission rate which is the summation of (l) for all let down tanks, 220, 221, 222, 227, and 229;
- n. the average hourly OC emissions (m/b).

* Displacement = (0.01246)(S)(P)(MW)(Q)/T
 Where:

P = vapor pressure of material loaded
 S = 1.0 on the basis that the vapor space is saturated with vapors, submerged fill
 MW = vapor molecular weight (lb/lb-mole)
 Q = volume of material loaded (gal)
 T = temperature (R)**

Evaporation = (MW)(K)(A)(P)3600/(R)(T)
 Where:

$K = (0.00438)(U^{0.78})[(18/MW)^{.33}]$
 U = 0.1 mile per hour from USEPA example
 R = universal gas constant, (10.73 psia)(ft³)/(lbmole)(R)
 A = open area of tank

Point Source= (Ed)(Qex)(Tex)/Batch volume
 Where:

Qex = volumetric exhaust rate measured at 24.23 gal/min
 Tex = time exhaust fan is running during dries addition (assume 5 min per batch)

Heat Up = [(P_{X_{T1}}/14.7 - P_{X_{T1}}) + (P_{X_{T2}}/14.7 - P_{X_{T2}})] / (2)(Δn)(MW)

DAP I**PTI A**

Emissions Unit ID: P005

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Where:

$$\Delta n = (V/R)(P_{a1}/T_1 - P_{a2}/T_2) = \text{lb-moles of gas displaced}$$

P_x = partial pressure of each VOC in vessel headspace (psia)

P_a = gas pressure in vessel (psia)

T_1 = initial gas temperature (R)**

T_2 = final gas temperature (R)**

**The mixing processes occur at ambient temperature. No heat is applied, no exothermic reactions occur and no appreciable amount of internal friction is generated.

IV. Reporting Requirements

1. In accordance with paragraph A.2.b of the General Terms and Conditions, the permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the average hourly organic compound emissions from the mixing and/or storing of materials exceeded 2.31 pounds per hour, and the actual average hourly organic compound emissions for each such day.
 - b. An identification of each day during which the organic compound emissions from the mixing and/or storing of materials exceeded 17.28 pounds per day, and the actual organic compound emissions for each such day.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.1 of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation-

2.31 lbs OC/hr

Applicable Compliance Method-
Compliance shall be based upon the record keeping as specified in III.1. of this permit.
 - b. Emission Limitation-

DAP I

PTI A

Issued: To be entered upon final issuance

Emissions Unit ID: P005

17.28 lbs OC/day

Applicable Compliance Method-
Compliance shall be based upon the record keeping as specified in III.1. of this permit.

c. Emission Limitation-

33.20 TPY OC

Applicable Compliance Method-
Compliance shall be determined based upon the record keeping in Section III.1 of this permit and shall be the summation of the organic emissions, divided by 2000 lbs/ton.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. 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>	<u>Applicable Emissions Limitations/Control Measures</u>
P005 - Let-down Paint Tanks 220, 221, 222, 227, and 229		Compliance with Air Toxic Policy

2. Additional Terms and Conditions

2.a None.

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

- 1. The permit to install for this emissions unit (P005) was evaluated based on the actual materials specified by the permittee in the permit to install application. The emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worse case" each pollutant(s):

Pollutant: Toluene

TLV (ug/m3): 188,400

Maximum Hourly Emission Rate (lbs/hr): 4.23

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 135.8

MAGLC (ug/m3): 4485.0

DAP I**PTI A**

Emissions Unit ID: P005

Issued: To be entered upon final issuance

Pollutant: Methanol

TLV (ug/m3): 262,090

Maximum Hourly Emission Rate (lbs/hr): 1.40

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 46.13

MAGLC (ug/m3): 6240

Physical changes to or changes in the method of operation of the emissions unit that 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.)

DAP I**PTI A**

Emissions Unit ID: P005

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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 be 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.

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.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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PTI Application: 08-04222

Issued

Facility ID: 0855130356

Emissions Unit ID: P012

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. State and Federally Enforceable Section****I. 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>	<u>Applicable Emissions Limitations/Control Measures</u>
P012 - No. 1 and No. 2 Cowles Small Paint Mixers	OAC rule 3745-31-05(A)(3)	1.28 lbs organic compounds (OC)/hr, 30.72 lbs/day and 5.60 TPY OC
	OAC rule 3745-21-07(G)(2)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

2.a None.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information on a daily basis for each paint mixer identified as Mixer 1 and Mixer 2:
 - a. the company identification for each batch of product mixed/stored;
 - b. the number of hours of operation;
 - c. the number of gallons mixed/stored of each product;
 - d. the number of batches of each product mixed/stored;
 - e. the calculated vapor pressure (psia) of the product (psia);
 - f. the calculated vapor molecular weight (lb/lb-mole);
 - g. the average temperature of each let-down tank when in operation (R)**;
 - h. the open area of each tank (square meters);
 - i. partial pressure of each VOC in vessel headspace (psia);

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- j. the calculated gas vapor pressure in vessel (psia);
- k. average initial gas temperature and final gas temperature**;
- l. the determination of the displacement, evaporation, point source, and heat up losses for each product mixed/stored in each paint mixer, in accordance with the formulas and assumptions given in the "US EPA Emission Inventory Improvement Program Volume II: Chapter 8, Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Facilities", March 1998, for each product/day*;
- m. the total calculated OC emission rate which is the summation of (l) for all both paint mixers;
- n. the average hourly emission rate (m)/(b).

* Displacement = $(0.01246)(S)(P)(MW)(Q)/T$
Where:

P = vapor pressure of material loaded
S = 1.0 on the basis that the vapor space is saturated with vapors, submerged fill
MW = vapor molecular weight (lb/lb-mole)
Q = volume of material loaded (gal)
T = temperature (R)

Evaporation = $(MW)(K)(A)(P)3600/(R)(T)$
Where:

$K = (0.00438)(U^{0.78})[(18/MW)^{.33}]$
U = 0.1 mile per hour from USEPA example
R = universal gas constant, $(10.73 \text{ psia})(\text{ft}^3)/(\text{lbmole})(\text{R})$
A = open area of tank

Point Source = $(Ed)(Qex)(Tex)/\text{Batch volume}$
Where:

Qex = volumetric exhaust rate measured at 24.23 gal/min
Tex = time exhaust fan is running during dries addition (assume 5 min per batch)

Heat Up = $[(P_{XT1}/14.7 - P_{XT1}) + (P_{XT2}/14.7 - P_{XT2})] / (2)(\Delta n)(MW)$
Where:

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$$\Delta n = (V/R)(P_{a1}/T_1 - P_{a2}/T_2) = \text{lb-moles of gas displaced}$$

P_x = partial pressure of each VOC in vessel headspace (psia)

P_a = gas pressure in vessel (psia)

T_1 = initial gas temperature (R)

T_2 = final gas temperature (R)

**The mixing processes occur at ambient temperature. No heat is applied, no exothermic reactions occur and no appreciable amount of internal friction is generated.

IV. Reporting Requirements

1. In accordance with paragraph A.2.b. of the General Terms and Conditions, the permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the average hourly organic compound emissions from the mixing of materials exceeded 1.28 pounds per hour, and the actual average hourly organic compound emissions for each such day.
 - b. An identification of each day during which the organic compound emissions from the mixing of materials exceeded 30.48 pounds per day, and the actual organic compound emissions for each such day.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.1 of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation-

1.28 lbs OC/hr

Applicable Compliance Method-
Compliance shall be based upon the record keeping specified in Section III.1 of this permit.

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b. Emission Limitation-

30.72 lbs OC/day

Applicable Compliance Method-
Compliance shall be based upon the record keeping specified in Section III.1 of this permit.

c. Emission Limitation-

5.6 TPY OC

Applicable Compliance Method-
Compliance shall be based upon the record keeping specified in Section III.1 of this permit and shall be the summation of the organic emissions, divided by 2000 lbs/ton.

VI. Miscellaneous Requirements

None

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Emissions Unit ID: P012

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B. State Only Enforceable Section

I. 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>	<u>Applicable Emissions Limitations/Control Measures</u>
P012 - No. 1 and No. 2 Cowles Small Paint Mixers		Compliance with Air Toxic Policy

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit (P012) was evaluated based on the actual materials specified by the permittee in the permit to install application. The emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worse case" each pollutant(s):

Pollutant: Toluene

TLV (ug/m3): 188,400

Maximum Hourly Emission Rate (lbs/hr): 4.23

Issued: To be entered upon final issuance

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 135.8

MAGLC (ug/m3): 4485.0

Physical changes to or changes in the method of operation of the emissions unit that 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 be 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.

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Emissions Unit ID: P012

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.

IV. Reporting Requirements

None

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Emissions Unit ID: P012

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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Emissions Unit ID: P039

Issued: To be entered upon final issuance

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. 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>	<u>Applicable Emissions Limitations/Control Measures</u>
P039 - Aerosol Charger for the Charging of Aerosol Cans with Propellant	OAC rule 3745-31-05(A)(3)	0.60 lb organic compound (OC)/hr, 14.41 lbs OC/day, 2.62 TPY OC The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-07(G)(2)	

2. Additional Terms and Conditions

- 2.a None.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the number of cans filled;
 - b. the density of the material employed in the aerosol charger;
 - c. the number of hours of operation.

IV. Reporting Requirements

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Emissions Unit ID: P039

Issued: To be entered upon final issuance

1. In accordance with paragraph A.2.b of the General Terms and Conditions, the permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the average hourly organic compound emissions from the charging of materials exceeded 0.60 pound per hour, and the actual average hourly organic compound emissions for each such day.
 - b. An identification of each day during which the organic compound emissions from the mixing of materials exceeded 14.41 pounds per day, and the actual organic compound emissions for each such day.

V. Testing Requirements

Compliance with the emission limitation(s) in Section A.1 of these terms and conditions shall be determined in accordance with the following method(s):

1. Emission Limitation-
0.60 lb OC/hr

Applicable Compliance Method-

Compliance shall be determined by the following calculation:

- (i) dividing the density of each material employed in the aerosol charging process (lbs/gal) by the conversion factor of 3785.41 cc/gal;
- (ii) multiplying (i) for each material charged by an OC loss of 0.08 cc/can (emission factor supplied by DAP);
- (iii) multiplying (ii) for each material charged by the number of cans filled each day;
- (iv) summing the results in (iii) for each material charged;
- (v) dividing (iv) by the number of hours of operation each day.

2. Emission Limitation-
14.41 lbs OC/day

Applicable Compliance Method-

- (i) dividing the density of each material charged in the aerosol charging process (lbs/gal) by the conversion factor of 3785.41 cc/gal;
- (ii) multiplying (i) for each material charged by an OC loss of 0.08 cc/can (emission factor supplied by DAP);
- (iii) multiplying (ii) for each material charged by the number of cans filled each day;

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(iv) summing the results in (iii) for each material employed.

3. Emission Limitation-
2.62 TPY OC

Applicable Compliance Method-

Compliance shall be determined by summing the daily OC emissions (lbs), and dividing by 2000 lbs/ton.

VI. Miscellaneous Requirements

None

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Emissions Unit ID: P039

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B. State Only Enforceable Section

I. 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>	<u>Applicable Emissions Limitations/Control Measures</u>
P039 - Aerosol Charger for the Charging of Aerosol Cans with Propellant		

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

DAP I**PTI A**

Emissions Unit ID: P040

Issued: To be entered upon final issuance**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. State and Federally Enforceable Section****I. 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>	<u>Applicable Emissions Limitations/Control Measures</u>
P040 - Daptex Charger for the Charging of Aerosol Cans with Propellant	OAC rule 3745-31-05(A)(3) OAC rule 3745-21-07(G)(2)	0.51 lb organic compound (OC)/hr, 12.27 lbs OC/day, 2.24 TPY OC The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a None.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the number of cans filled;
 - b. the density of the material employed in the Daptex charger;
 - c. the number of hours of operation.

IV. Reporting Requirements

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Emissions Unit ID: P040

Issued: To be entered upon final issuance

1. In accordance with paragraph A.2.b of the General Terms and Conditions, the permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the average hourly organic compound emissions from the charging of materials exceeded 0.51 pound per hour, and the actual average hourly organic compound emissions for each such day.
 - b. An identification of each day during which the organic compound emissions from the mixing of materials exceeded 12.27 pounds per day, and the actual organic compound emissions for each such day.

V. Testing Requirements

Compliance with the emission limitation(s) in Section A.1 of these terms and conditions shall be determined in accordance with the following method(s):

1. Emission Limitation-
0.51 lb OC/hr

Applicable Compliance Method-

Compliance shall be determined by the following calculation:

- (i) dividing the density of each material charged in the Daptex charging process (lbs/gal) by the conversion factor of 3785.41 cc/gal;
- (ii) multiplying (i) for each material charged by an OC loss of 0.16 cc (emission factor supplied by DAP);
- (iii) multiplying (ii) for each material charged by the number of cans filled each day;
- (iv) summing the results in (iii) for each material charged;
- (v) dividing (iv) by the number of hours of operation each day.

2. Emission Limitation-
12.27 lbs OC/day

Applicable Compliance Method-

- (i) dividing the density of each material charged in the Daptex charging process (lbs/gal) by the conversion factor of 3785.41 cc/gal;
- (ii) multiplying (i) for each material charged by an OC loss of 0.16 cc (emission factor supplied by DAP);
- (iii) multiplying (ii) for each material charged by the number of cans filled each day;

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(iv) summing the results in (iii) for each material charged.

3. Emission Limitation-
2.24 TPY OC

Applicable Compliance Method-

Compliance shall be determined by summing the daily OC emissions (lbs), and dividing by 2000 lbs/ton.

VI. Miscellaneous Requirements

None

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Emissions Unit ID: P040

Issued: To be entered upon final issuance**B. State Only Enforceable Section****I. 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>	<u>Applicable Emissions Limitations/Control Measures</u>
P040 - Daptex Charger for the Charging of Aerosol Cans with Propellant		

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. 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>	<u>Applicable Emissions Limitations/Control Measures</u>
P041 - Large Elgin Can Filler Located at the Contact Cements Packaging Line	OAC rule 3745-31-05(A)(3)	5.7 lbs organic compound (OC)/hr, and 62.50 lbs OC/day for each day when only non-photochemically reactive materials are packaged
		5.7 lbs OC/hr, 40 lbs OC/day for each day when any photochemically reactive materials are packaged.
		11.40 TPY OC
	OAC rule 3745-21-07(G)(2)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

2.a None.

II. Operational Restrictions

1. Each day on which any photochemically reactive material (PRM) is employed in this emissions unit, the daily OC emissions shall not exceed 40 lbs/day.

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1. The permittee shall collect and record the following information on a daily basis for the large elgin can filler :
 - a. the company identification for each product packaged;
 - b. the number of hours of operation;
 - c. for each day during which only non-photochemically reactive materials are packaged, the number of gallons packaged;
 - d. for each day during which a photochemically reactive material is packaged, the total number of gallons packaged;
 - e. the calculated vapor pressure (psia) of each product packaged;
 - f. the calculated vapor molecular weight (lb/lb-mole);
 - g. the average temperature of the product packaged (R)**;
 - h. the determination of the displacement emissions losses (lbs/day) for each product packaged, in accordance with the formulas and assumptions given in the "US EPA Emission Inventory Improvement Program Volume II: Chapter 8, Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Facilities", March 1998, for each product/day*;
 - i. the summation of (h) for all products packaged each day;
 - j. the average hourly emissions (i)/(b).

* Displacement = $(0.01246)(S)(P)(MW)(Q)/T$

Where:

P = vapor pressure of material loaded

S = 0.5 on the basis that the material is loaded into a clean container

MW = vapor molecular weight (lb/lb-mole)

Q = volume of material loaded (gal)

T = temperature (R)

**Based on the temperature of the product as it exits the mixer

IV. Reporting Requirements

1. In accordance with paragraph A.2.b of the General Terms and Conditions, the permittee shall submit quarterly deviation (excursion) reports which include the following information:

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- a. On days when any material (i.e. photochemically reactive material or non-photochemically material) was packaged, an identification of each day during which the average hourly organic compound emissions exceeded 5.7 lbs/hr and the actual average hourly organic compound emissions for each such day.
- b. On days when any photochemically reactive material was packaged, an identification of each day during which the organic compound emissions exceeded 40.0 lbs/day and the actual average hourly organic compound emissions for each such day.
- c. On days when only non-photochemically reactive material was packaged, an identification of each day during which the organic compound emissions from the packaging of the products exceeded 62.50 lbs/day and the actual average hourly organic compound emissions for

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such
day.

2. The permittee shall submit annual reports to the Director (Ohio EPA District Office or local air agency) for the elgin can filler which summarizes the actual annual OC emissions for this emissions unit. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

V. Testing Requirements

Compliance with the emission limitation(s) in Section A.1 of these terms and conditions shall be determined in accordance with the following method(s):

1. Emission Limitation-
5.7 lbs OC/hr

Applicable Compliance Method-

Compliance shall be based on the record keeping specified in Section III.1 of this permit.

2. Emission Limitation-
40 lbs OC/day during any day on which a photochemically reactive material is packaged

Applicable Compliance Method-

Compliance shall be based on the record keeping specified in Section III.1 of this permit

3. Emission Limitation-
62.50 lbs OC/day during any day on which only non-photochemically reactive material is packaged

Applicable Compliance Method-

Compliance shall be based on the record keeping specified in Section III.1 of this permit.

4. Emission Limitation-
11.40 TPY OC

Applicable Compliance Method-

Compliance shall be based upon the record keeping specified in Section III.1 of this permit and shall be the summation of the daily organic compound emission rate (lbs), and dividing by 2,000

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pounds per ton.

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VI. Miscellaneous Requirements

None.

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B. State Only Enforceable Section

I. 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>	<u>Applicable Emissions Limitations/Control Measures</u>
P041 - Large Elgin Can Filler Located at the Contact Cements Packaging Line		Air Toxic Policy

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit (P041) was evaluated based on the actual materials specified by the permittee in the permit to install application. The emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worse case" each pollutant(s):

Pollutant: Toluene

TLV (ug/m3): 188,400

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Maximum Hourly Emission Rate (lbs/hr): 4.23

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 135.8

MAGLC (ug/m3): 4485.0

Pollutant: MEK

TLV (ug/m3): 589,770

Maximum Hourly Emission Rate (lbs/hr): 1.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 33.32

MAGLC (ug/m3): 14,042

Physical changes to or changes in the method of operation of the emissions unit that 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

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3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will be 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.

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.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. 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>	<u>Applicable Emissions Limitations/Control Measures</u>
P042 - Small Elgin Can Filler located at the Packaging Line for Contact Cements and Mastics	OAC rule 3745-31-05(A)(3)	4.8 lbs organic compound (OC)/hr, and 62.50 lbs OC/day for each day when only non-photochemically reactive materials are packaged
		4.8 lbs OC/hr, 40 lbs/day for each day when any photochemically reactive materials are packaged.
		11.40 TPY OC
	OAC rule 3745-21-07(G)(2)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a None.

II. Operational Restrictions

1. Each day on which any photochemically reactive material (PRM) is employed in this emissions unit, the daily OC emissions shall not exceed 40 lbs/day.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information on a daily basis for the small elgin can filler :

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- a. the company identification for each product packaged;
- b. the number of hours of operation;
- c. for each day during which only non-photochemically reactive materials are packaged, the number of gallons packaged;
- d. for each day during which a photochemically reactive material is packaged, the total number of gallons packaged;
- e. the calculated vapor pressure (psia) of each product packaged;
- f. the calculated vapor molecular weight (lb/lb-mole);
- g. the average temperature of the product packaged (R);**
- h. the determination of the displacement emissions losses (lbs/day) for each product packaged, in accordance with the formulas and assumptions given in the "US EPA Emission Inventory Improvement Program Volume II: Chapter 8, Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Facilities", March 1998, for each product/day*;
- i. the summation of (h) for all products packaged each day;
- j. the average hourly emissions (i)/(b).

* Displacement = $(0.01246)(S)(P)(MW)(Q)/T$

Where:

P = vapor pressure of material loaded

S = 0.5 on the basis that the material is loaded into a clean container

MW = vapor molecular weight (lb/lb-mole)

Q = volume of material loaded (gal)

T = temperature (R)

** Based on the temperature of the product as it exits the mixer

IV. Reporting Requirements

1. In accordance with paragraph A.2.b of the General Terms and Conditions, the permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. On days when any material (i.e. photochemically reactive material or non-photochemically material) was packaged, an identification of each day during which the average hourly organic compound emissions exceeded 4.8

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lbs/hr and the actual average hourly organic compound emissions for each such day.

- b. On days when any photochemically reactive material was packaged, an identification of each day during which the organic compound emissions exceeded 40.0 lbs/day and the actual average hourly organic compound emissions for each such day.

- c. On days when only non-photochemically reactive material was packaged, an identification of each day during which the organic compound emissions from the packaging of the products exceeded 62.50 lbs/day and the actual average hourly organic compound emissions for

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each
such
day.

- 2. The permittee shall submit annual reports to the Director (Ohio EPA District Office or local air agency) for the elgin can filler which summarizes the actual annual OC emissions for this emissions unit. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

V. Testing Requirements

Compliance with the emission limitation(s) in Section A.1 of these terms and conditions shall be determined in accordance with the following method(s):

- 1. Emission Limitation-
4.8 lbs OC/hr

Applicable Compliance Method-
Compliance shall be based on record keeping specified in Section III.1 of this permit.

- 2. Emission Limitation-
40 lbs OC/day during any day on which a photochemically reactive material is packaged

Applicable Compliance Method-
Compliance shall be based on the record keeping specified in Section III.1 of this permit

- 3. Emission Limitation-
62.50 lbs OC/day during any day on which only non-photochemically material is packaged

Applicable Compliance Method-
Compliance shall be determined in accordance with the record keeping in Section III.1 of this permit.

- 4. Emission Limitation-
11.40 TPY OC

Applicable Compliance Method-
Compliance shall be based upon the record keeping specified in Section III.1 of this permit and shall be the summation of the daily organic compound emission rate (lbs), and divided by 2,000

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pounds per ton.

VI. Miscellaneous Requirements

None

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B. State Only Enforceable Section

I. 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>	<u>Applicable Emissions Limitations/Control Measures</u>
P042 - Small Elgin Can Filler located at the Packaging Line for Contact Cements and Mastics		Compliance with Air Toxics Policy

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit (P042) was evaluated based on the actual materials specified by the permittee in the permit to install application. The emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worse case" each pollutant(s):

Pollutant: Toluene

TLV (ug/m3): 188,400

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Maximum Hourly Emission Rate (lbs/hr): 4.23

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 135.8

MAGLC (ug/m3): 4485.0

Pollutant: Methanol

TLV (ug/m3): 262,090

Maximum Hourly Emission Rate (lbs/hr): 1.40

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 46.13

MAGLC (ug/m3): 6240

Pollutant: MEK

TLV (ug/m3): 589,770

Maximum Hourly Emission Rate (lbs/hr): 1.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 33.32

MAGLC (ug/m3): 14,042

Pollutant: Hexane

TLV (ug/m3): 176,200

Maximum Hourly Emission Rate (lbs/hr): 3.79

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 123

MAGLC (ug/m3): 41,952

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Physical changes to or changes in the method of operation of the emissions unit that 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 be 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.

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

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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.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. 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>	<u>Applicable Emissions Limitations/Control Measures</u>
P043 - 55-Gallon Drum Filler located at the Packaging Line for Contact Cements	OAC rule 3745-31-05(A)(3)	4.8 lbs organic compound (OC)/hr, and 115.72 lbs OC/day for each day when only non-photochemically reactive materials are packaged
		4.8 lbs OC/hr, 40 lbs/day for each day when any photochemically reactive materials are packaged.
		21.16 TPY OC
	OAC rule 3745-21-07(G)(2)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

2.a None.

II. Operational Restrictions

1. Each day on which any photochemically reactive material (PRM) is employed in this emissions unit, the daily OC emissions shall not exceed 40 lbs/day.

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Issued: To be entered upon final issuance**III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information on a daily basis for the 55-gallon drum filler :
 - a. the company identification for each product packaged;
 - b. the number of hours of operation;
 - c. for each day during which only non-photochemically reactive materials are packaged, the number of gallons packaged;
 - d. for each day during which a photochemically reactive material is packaged, the total number of gallons packaged;
 - e. the calculated vapor pressure (psia) of each product packaged;
 - f. the calculated vapor molecular weight (lb/lb-mole);
 - g. the average temperature of the product packaged (R)**;
 - h. the determination of the displacement emissions losses (lbs/day) for each product packaged, in accordance with the formulas and assumptions given in the "US EPA Emission Inventory Improvement Program Volume II: Chapter 8, Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Facilities", March 1998, for each product/day*;
 - i. the summation of (h) for all products packaged each day;
 - j. the average hourly emissions (i)/(b).

* Displacement = $(0.01246)(S)(P)(MW)(Q)/T$

Where:

P = vapor pressure of material loaded

S = 0.5 on the basis that the material is loaded into a clean container

MW = vapor molecular weight (lb/lb-mole)

Q = volume of material loaded (gal)

T = temperature (R)

** Based on the temperature of the product as it exits the mixer

IV. Reporting Requirements

1. In accordance with paragraph A.2.b of the General Terms and Conditions, the permittee shall submit quarterly deviation (excursion) reports which include the following information:

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- a. On days when any material (i.e. photochemically reactive material or non-photochemically material) was packaged, an identification of each day during which the average hourly organic compound emissions exceeded 4.8 lbs/hr and the actual average hourly organic compound emissions for each such day.
- b. On days when any photochemically reactive material was packaged, an identification of each day during which the organic compound emissions exceeded 40.0 lbs/day and the actual average hourly organic compound emissions for each such day.
- c. On days when only non-photochemically reactive materials were packaged, an identification of each day during which the organic compound emissions from the packaging of the products exceeded 115.72 lbs/day and the actual average hourly organic compound

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emissions for each such day.

2. The permittee shall submit annual reports to the Director (Ohio EPA District Office or local air agency) for the elgin can filler which summarizes the actual annual OC emissions for this emissions unit. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

V. Testing Requirements

Compliance with the emission limitation(s) in Section A.1 of these terms and conditions shall be determined in accordance with the following method(s):

1. Emission Limitation-
4.8 lbs OC/hr

Applicable Compliance Method-
Compliance shall be based on the record keeping specified in Section III.1 of this permit.
2. Emission Limitation-
40 lbs OC/day during any day on which a photochemically reactive material is packaged

Applicable Compliance Method-
Compliance shall be based on the record keeping specified in Section III.1 of this permit.
3. Emission Limitation-
115.72 lbs OC/day during any day on which only non-photochemically reactive material is packaged.

Applicable Compliance Method-
Compliance shall be based on the record keeping specified in Section III.1 of this permit.
4. Emission Limitation-
21.16 TPY OC

Applicable Compliance Method-

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Compliance shall be based upon the record keeping specified in Section III.1 of this permit and shall be the summation of the daily organic compound emission rate (lbs), divided by 2,000 pounds per ton.

VI. Miscellaneous Requirements

None

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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>	<u>Applicable Emissions Limitations/Control Measures</u>
P043 - 55-Gallon Drum Filler located at the Packaging Line for Contact Cements		Compliance with Air Toxic Policy

2. Additional Terms and Conditions

- 2.a None.

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit (P043) was evaluated based on the actual materials specified by the permittee in the permit to install application. The emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worse case" each pollutant(s):

Pollutant: Toluene

TLV (ug/m3): 188,400

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Maximum Hourly Emission Rate (lbs/hr): 4.23

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Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 135.8

MAGLC (ug/m3): 4485.0

Pollutant: Methylene Chloride

TLV (ug/m3): 173,680

Maximum Hourly Emission Rate (lbs/hr): 10.2

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 330.6

MAGLC (ug/m3): 4135

Pollutant: Hexane

TLV (ug/m3): 176,200

Maximum Hourly Emission Rate (lbs/hr): 3.79

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 123

MAGLC (ug/m3): 41,952

Physical changes to or changes in the method of operation of the emissions unit that 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

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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 be 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.

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.

IV. Reporting Requirements

None

V. Testing Requirements

None

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VI. Miscellaneous Requirements

None

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Issued: To be entered upon final issuance**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. State and Federally Enforceable Section****I. 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>	<u>Applicable Emissions Limitations/Control Measures</u>
P044 - 5-Gallon Pail Filler located at the Packaging Line for Contact Cements	OAC rule 3745-31-05(A)(3)	5.4 lbs organic compound (OC)/hr, and 43.26 lbs OC/day for each day when only non-photochemically reactive materials are packaged
		5.4 lbs OC/hr, 40 lbs/day for each day when any photochemically reactive materials are packaged.
		7.89 TPY OC
	OAC rule 3745-21-07(G)(2)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a None.

II. Operational Restrictions

1. Each day on which any photochemically reactive material (PRM) is employed in this emissions unit, the daily OC emissions shall not exceed 40 lbs/day.

III. Monitoring and/or Recordkeeping Requirements

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1. The permittee shall collect and record the following information on a daily basis for the 5-gallon pail filler :
 - a. the company identification for each product packaged;
 - b. the number of hours of operation;
 - c. for each day during which only non-photochemically reactive materials are packaged, the number of gallons packaged;
 - d. for each day during which a photochemically reactive material is packaged, the total number of gallons packaged;
 - e. the calculated vapor pressure (psia) of each product packaged;
 - f. the calculated vapor molecular weight (lb/lb-mole);
 - g. the average temperature of the product packaged (R)**;
 - h. the determination of the displacement emissions losses (lbs/day) for each product packaged, in accordance with the formulas and assumptions given in the "US EPA Emission Inventory Improvement Program Volume II: Chapter 8, Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Facilities", March 1998, for each product/day*;
 - i. the summation of (h) for all products packaged each day;
 - j. the average hourly emissions (i)/(b).

* Displacement = $(0.01246)(S)(P)(MW)(Q)/T$

Where:

P = vapor pressure of material loaded

S = 0.5 on the basis that the material is loaded into a clean container

MW = vapor molecular weight (lb/lb-mole)

Q = volume of material loaded (gal)

T = temperature (R)

** Based on the temperature of the product as it exits the mixer

IV. Reporting Requirements

1. In accordance with paragraph A.2.b of the General Terms and Conditions, the permittee shall submit quarterly deviation (excursion) reports which include the following information:

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- a. On days when any material (i.e. photochemically reactive material or non-photochemically material) was packaged, an identification of each day during which the average hourly organic compound emissions exceeded 5.4 lbs/hr and the actual average hourly organic compound emissions for each such day.
- b. On days when a photochemically reactive material was packaged, an identification of each day during which the organic compound emissions exceeded 40.0 lbs/day and the actual average hourly organic compound emissions for each such day.
- c. On days when only non-photochemically reactive materials were packaged, an identification of each day during which the organic compound emissions from the packaging of the products exceeded 43.26 lbs/day and the actual average

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und
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ns for
each
such
day.

V. Testing Requirements

Compliance with the emission limitation(s) in Section A.1 of these terms and conditions shall be determined in accordance with the following method(s):

1. Emission Limitation-
5.4 lbs OC/hr

Applicable Compliance Method-
Compliance shall be based on the record keeping specified in Section III.1.

2. Emission Limitation-
40 lbs OC/day during any day on which a photochemically reactive material is packaged

Applicable Compliance Method-
Compliance shall be based on the record keeping specified in Section III.1 of this permit.

3. Emission Limitation-
43.26 lbs OC/day during any day on which only non-photochemically reactive material is packaged.

Applicable Compliance Method-
Compliance shall be based on the record keeping specified in Section III.1 of this permit.

4. Emission Limitation-
7.89 TPY OC

Applicable Compliance Method-
Compliance shall be based upon the record keeping specified in Section III.1 of this permit and shall be the summation of the daily organic compound emission rate, divided by 2,000 pounds per ton.

VI. Miscellaneous Requirements

None

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B. State Only Enforceable Section

I. 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>	<u>Applicable Emissions Limitations/Control Measures</u>
P044 - 5-Gallon Pail Filler located at the Packaging Line for Contact Cements		Compliance with Air Toxic Policy

2. Additional Terms and Conditions

- 2.a None.

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit (P044) was evaluated based on the actual materials specified by the permittee in the permit to install application. The emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worse case" each pollutant(s):

Pollutant: Toluene

TLV (ug/m3): 188,400

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Maximum Hourly Emission Rate (lbs/hr): 4.23

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 135.8

MAGLC (ug/m3): 4485.0

Pollutant: Methylene Chloride

TLV (ug/m3): 173,680

Maximum Hourly Emission Rate (lbs/hr): 10.2

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 330.6

MAGLC (ug/m3): 4135

Pollutant: MEK

TLV (ug/m3): 589,770

Maximum Hourly Emission Rate (lbs/hr): 1.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 33.32

MAGLC (ug/m3): 14,042

Pollutant: Hexane

TLV (ug/m3): 176,200

Maximum Hourly Emission Rate (lbs/hr): 3.79

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 123

MAGLC (ug/m3): 41,952

Physical changes to or changes in the method of operation of the emissions unit that its

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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 be 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.

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.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

DAP I**PTI A**

Emissions Unit ID: P045

Issued: To be entered upon final issuance**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. State and Federally Enforceable Section****I. 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>	<u>Applicable Emissions Limitations/Control Measures</u>
P045 - 4-Stem Prosys Filler	OAC rule 3745-31-05(A)(3)	2.84 lbs/hr organic compound (OC)/hr, 69.62 lbs OC/day for each day when only non-photochemically reactive materials are packaged
		2.84 lbs OC/hr and 40 lbs/day for each day when any photochemically reactive materials are packaged.
		12.7 TPY OC
	OAC rule 3745-21-07(G)(2)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions**2.a** None**II. Operational Restrictions**

1. Each day on which any photochemically reactive material (PRM) is employed in this emissions unit, the daily OC emissions shall not exceed 40 lbs/day.

III. Monitoring and/or Recordkeeping Requirements

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Emissions Unit ID: P045

Issued: To be entered upon final issuance

1. The permittee shall collect and record the following information on a daily basis for the 4-Stem Prosys Filler :
 - a. the company identification for each product packaged;
 - b. the number of hours of operation;
 - c. for each day during which only non-photochemically reactive material are packaged, the number of gallons packaged;
 - d. for each day during which a photochemically reactive material is packaged, the total number of gallons packaged;
 - e. the calculated vapor pressure (psia) of the product packaged;
 - f. the calculated vapor molecular weight (lb/lb-mole);
 - g. the average temperature of the product packaged (R)**;
 - h. the determination of the displacement emissions losses (lbs/day) for each product packaged, in accordance with the formulas and assumptions given in the "US EPA Emission Inventory Improvement Program Volume II: Chapter 8, Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Facilities", March 1998, for each product/day*;
 - i. the summation of (h) for all products packaged each day;
 - j. the average hourly emissions (i)/(b).

* Displacement = $(0.01246)(S)(P)(MW)(Q)/T$

Where:

P = vapor pressure of material loaded

S = 0.5 on the basis that the material is loaded into a clean container

MW = vapor molecular weight (lb/lb-mole)

Q = volume of material loaded (gal)

T = temperature (R)

** Based on the temperature of the product as it exits the mixer

IV. Reporting Requirements

1. In accordance with paragraph A.2.b of the General Terms and Conditions, the permittee shall submit quarterly deviation (excursion) reports which include the following information:

Emissions Unit ID: P045

- a. On days when any material (i.e. photochemically reactive material or non-photochemically material) was packaged, an identification of each day during which the average hourly organic compound emissions exceeded 2.84 lbs/hr and the actual average hourly organic compound emissions for each such day.
- b. On days when any photochemically reactive material was packaged, an identification of each day during which the organic compound emissions exceeded 40.0 lbs/day and the actual average hourly organic compound emissions for each such day.
- c. On days when only non-photochemically reactive materials were packaged, an identification of each day during which the organic compound emissions from the packaging of the products exceeded 69.62 lbs/day and the actual average hourly organic compound emissions

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Emissions Unit ID: P045

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ns for
each
such
day.

2. The permittee shall submit annual reports to the Director (Ohio EPA District Office or local air agency) for the 4-Stem Prosys Filler which summarizes the actual annual OC emissions for this emissions unit. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

V. Testing Requirements

Compliance with the emission limitation(s) in Section A.1 of these terms and conditions shall be determined in accordance with the following method(s):

1. Emission Limitation-
2.84 lbs OC/hr

Applicable Compliance Method-
Compliance shall be based on the record keeping specified in Section III.1.
2. Emission Limitation-
40.0 lbs OC/day during any day on which a photochemically reactive material is packaged

Applicable Compliance Method-
Compliance shall be based on the record keeping specified in Section III.1.
3. Emission Limitation-
69.62 lbs OC/day during any day on which only non-photochemically reactive material is packaged

Applicable Compliance Method-
Compliance shall be determined in accordance with the record keeping in Section III.1.
4. Emission Limitation-
12.7 TPY OC

Applicable Compliance Method-
Compliance shall be based upon the record keeping specified in Section III.1 of this permit and

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shall be the summation of the daily organic compound emission rate, divided by 2,000 pounds per ton.

VI. Miscellaneous Requirements

None

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Emissions Unit ID: P045

Issued: To be entered upon final issuance**B. State Only Enforceable Section****I. 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>	<u>Applicable Emissions Limitations/Control Measures</u>
P045 - 4-Stem Prosys Filler		Compliance with Air Toxic Policy

2. Additional Terms and Conditions

- 2.a None.

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit (P045) was evaluated based on the actual materials specified by the permittee in the permit to install application. The emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worse case" each pollutant(s):

Pollutant: Toluene

TLV (ug/m3): 188,400

Maximum Hourly Emission Rate (lbs/hr): 4.23

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Emissions Unit ID: P045

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 135.8

MAGLC (ug/m3): 4485.0

Pollutant: Hexane

TLV (ug/m3): 176,200

Maximum Hourly Emission Rate (lbs/hr): 3.79

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 123

MAGLC (ug/m3): 41,952

Physical changes to or changes in the method of operation of the emissions unit that 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

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Emissions Unit ID: P045

Issued: To be entered upon final issuance

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 be 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.

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.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

DAP I**PTI A**

Emissions Unit ID: P046

Issued: To be entered upon final issuance**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. State and Federally Enforceable Section****I. 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>	<u>Applicable Emissions Limitations/Control Measures</u>
P046 - 3-Stem Prosys Filler	OAC rule 3745-31-05(A)(3)	5.16 lbs/hr organic compound (OC)/hr and 72.54 lbs OC/day for each day when only non-photochemically reactive materials are packaged..
		5.16 lbs OC/hr and 40 lbs/day for each day when any photochemically reactive materials are packaged.
		13.24 TPY OC
	OAC rule 3745-21-07(G)(2)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions**2.a** None.**II. Operational Restrictions**

1. Each day on which any photochemically reactive material (PRM) is employed in this emissions unit, the daily OC emissions shall not exceed 40 lbs/day.

III. Monitoring and/or Recordkeeping Requirements

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Issued

Facility ID: 0855130356

Emissions Unit ID: P046

1. The permittee shall collect and record the following information on a daily basis for the 3-Stem Prosys Filler :
 - a. the company identification for each product packaged;
 - b. the number of hours of operation;
 - c. for each day during which only non-photochemically reactive material are packaged, the number of gallons packaged;
 - d. for each day during which a photochemically reactive material is packaged, the total number of gallons packaged;
 - e. the calculated vapor pressure (psia) of each product packaged;
 - f. the calculated vapor molecular weight (lb/lb-mole);
 - g. the average temperature of the product packaged (R)**;
 - h. the determination of the displacement emissions losses (lbs/day) for each product packaged, in accordance with the formulas and assumptions given in the "US EPA Emission Inventory Improvement Program Volume II: Chapter 8, Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Facilities", March 1998, for each product/day*;
 - i. the summation of (h) for all products packaged each day;
 - j. the average hourly emissions (i)/(b).

* Displacement = $(0.01246)(S)(P)(MW)(Q)/T$
Where:

P = vapor pressure of material loaded
 S = 0.5 on the basis that the material is loaded into a clean container
 MW = vapor molecular weight (lb/lb-mole)
 Q = volume of material loaded (gal)
 T = temperature (R)

** Based on the temperature of the product as it exits the mixer

IV. Reporting Requirements

1. In accordance with paragraph A.2.b of the General Terms and Conditions, the permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. When any material (i.e. photochemically reactive material or non-photochemically material) was packaged, an identification of each day during which the average hourly organic compound emissions exceeded 5.16

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lbs/hr and the actual average hourly organic compound emissions for each such day.

- b. When a photochemically reactive material was packaged, an identification of each day during which the organic compound emissions exceeded 40.0 lbs/day and the actual average hourly organic compound emissions for each such day.

- c. On days when only non-photochemically reactive materials were packaged, an identification of each day during which the organic compound emissions from the packaging of the products exceeded 72.54 lbs/day and the actual average hourly organic compound

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emissions for each such day.

2. The permittee shall submit annual reports to the Director (Ohio EPA District Office or local air agency) for the 3-Stem Prosys Filler which summarizes the actual annual OC emissions for this emissions unit. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

V. Testing Requirements

Compliance with the emission limitation(s) in Section A.1 of these terms and conditions shall be determined in accordance with the following method(s):

1. Emission Limitation-
5.16 lbs OC/hr

Applicable Compliance Method-
Compliance shall be based on the record keeping specified in Section III.1.
2. Emission Limitation-
40.0 lbs OC/day during any day on which a photochemically reactive material is packaged

Applicable Compliance Method-
Compliance shall be based on the record keeping specified in Section III.1.
3. Emission Limitation-
72.54 lbs OC/day during any day on which only non-photochemically reactive material is packaged

Applicable Compliance Method-
Compliance shall be determined in accordance with the record keeping in Section III.1.
4. Emission Limitation-
13.24 TPY OC

Applicable Compliance Method-

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Issued

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Compliance shall be based upon the record keeping specified in Section III.1 of this permit and shall be the summation of the daily organic compound emission rate (lbs), divided by 2,000 pounds per ton.

VI. Miscellaneous Requirements

None

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Emissions Unit ID: P046

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B. State Only Enforceable Section

I. 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>	<u>Applicable Emissions Limitations/Control Measures</u>
P046 - 3-Stem Prosys Filler		Compliance with Air Toxic Policy

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit (P046) was evaluated based on the actual materials specified by the permittee in the permit to install application. The emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worse case" each pollutant(s):

Pollutant: Toluene

TLV (ug/m3): 188,400

Maximum Hourly Emission Rate (lbs/hr): 4.23

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Emissions Unit ID: P046

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Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 135.8

MAGLC (ug/m3): 4485.0

Pollutant: Hexane

TLV (ug/m3): 176,200

Maximum Hourly Emission Rate (lbs/hr): 3.79

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 123

MAGLC (ug/m3): 41,952

Physical changes to or changes in the method of operation of the emissions unit that 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 be 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.

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.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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Emissions Unit ID: P047

Issued: To be entered upon final issuance**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. State and Federally Enforceable Section****I. 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>	<u>Applicable Emissions <u>Limitations/Control</u> <u>Measures</u></u>
P047 - CC1 Mixer Powdered Mineral Bag Dump Station	OAC rule 3745-31-05(A)(3)	0.20 lb/hr and 0.30 TPY particulate emissions
	OAC rule 3745-17-11(B)(1)	Visible emissions of 5% opacity, as a 6-minute average
	OAC rule 3745-17-07(A)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
		The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a None.

II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 1 to 6 inches of water while the emission unit is in operation.

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Emissions Unit ID: P047

Issued: To be entered upon final issuance**III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.
2. The permittee shall maintain monthly records of the amount of pigment handled in this emissions unit.

IV. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.1 of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation-

0.20 lb/hr particulate emissions

Applicable Compliance Method-

Compliance shall be determined by multiplying the maximum amount of pigment which may be handled in this emissions unit each hour (1680 lbs) by the AP-42 emissions factor of 20 pounds of particulate emissions/ton of pigment handled, Table 6.4-1(1/95), dividing by 2000 lbs/ton, and multiplying by the control efficiency of 99% (1-0.99). If required, compliance with this mass emission limitation shall be based on

Emissions Unit ID: P047

stack testing.

b. Emission Limitation-

0.30 TPY particulate emissions

Applicable Compliance Method-
Compliance shall be determined by multiplying each 12-month summation of pigment handled by the AP-42 emission factor of 20 pounds of particulate emission/ton of pigment handled, Table 6.4-1 (1/95), dividing by 2000 lbs/ton, and multiplying by the control efficiency of 99% (1-0.99).

c. Emission Limitation-

5% visible emission, as a 6-minute average

Applicable Compliance Method-
Compliance shall be determined by visible emissions evaluations using the methods and procedures specified in USEPA Reference Method 9.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. 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>	<u>Applicable Emissions Limitations/Control Measures</u>
P047 - CC1 Mixer Powdered Mineral Bag Dump Station		

2. Additional Terms and Conditions

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2.a None.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

None.

IV. Reporting Requirements

None.

V. Testing Requirements

None.

VI. Miscellaneous Requirements

None.

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Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. 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>	<u>Applicable Emissions Limitations/Control Measures</u>
P048 - Mastic Mixer Powdered Mineral Bag Dump Station	OAC rule 3745-31-05(A)(3)	0.20 lb/hr and 0.30 TPY particulate emissions
	OAC rule 3745-17-11(B)(1)	Visible emissions of 5% opacity, as a 6-minute average
	OAC rule 3745-17-07(A)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
		The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

2.a None.

II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 1 to 6 inches of water while the emission unit is in operation.

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Emissions Unit ID: P048

Issued: To be entered upon final issuance**III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.
2. The permittee shall maintain monthly records of the amount of pigment handled in this emissions unit.

IV. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.1 of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation-

0.20 lb/hr particulate emissions

Applicable Compliance Method-

Compliance shall be determined by multiplying the maximum amount of pigment which may be handled in this emissions unit each hour (1680 lbs) by the AP-42 emissions factor of 20 pounds of particulate emissions/ton of pigment handled, Table 6.4-1(1/95), dividing by 2000 lbs/ton, and multiplying by the control efficiency of 99% (1-0.99). If required, compliance with this mass emission limitation shall be based on stack testing.

b. Emission Limitation-

0.30 TPY particulate emissions

Applicable Compliance Method-

Compliance shall be determined by multiplying each 12-month summation of pigment handled by the AP-42 emission factor of 20 pounds of particulate emission/ton of pigment handled, Table 6.4-1 (1/95), dividing by 2000 lbs/ton, and multiplying by the control efficiency of 99% (1-0.99).

c. Emission Limitation-

5% visible emission, as a 6-minute average

Applicable Compliance Method-

Compliance shall be determined by visible emissions evaluations using the methods and procedures specified in USEPA Reference Method 9.

VI. Miscellaneous Requirements

None

DAP I

PTI A

Emissions Unit ID: P048

Issued: To be entered upon final issuance

B. State Only Enforceable Section

I. 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>	<u>Applicable Emissions Limitations/Control Measures</u>
P048 - Mastic Mixer Powdered Mineral Bag Dump Station	OAC rule 3745-31-05	

2. Additional Terms and Conditions

- 2.a None.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

None.

IV. Reporting Requirements

None.

V. Testing Requirements

None.

VI. Miscellaneous Requirements

None.

DAP I**PTI A**

Emissions Unit ID: P049

Issued: To be entered upon final issuance**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. State and Federally Enforceable Section****I. 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>	<u>Applicable Emissions Limitations/Control Measures</u>
P049 - CC2 Mixer Powdered Mineral Bag Dump Station	OAC rule 3745-31-05(A)(3)	0.20 lb/hr and 0.30 TPY particulate emissions
	OAC rule 3745-17-11(B)(1)	Visible emissions of 5% opacity, as a 6-minute average
	OAC rule 3745-17-07(A)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
		The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a None.

II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 1 to 6 inches of water while the emission unit is in operation.

DAP I**PTI A**

Emissions Unit ID: P049

Issued: To be entered upon final issuance**III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.
2. The permittee shall maintain monthly records of the amount of pigment handled in this emissions unit.

IV. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.1 of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation-

0.20 lb/hr particulate emissions

Applicable Compliance Method-

Compliance shall be determined by multiplying the maximum amount of pigment which may be handled in this emissions unit each hour (1680 lbs) by the AP-42 emissions factor of 20 pounds of particulate emissions/ton of pigment handled, Table 6.4-1(1/95), dividing by 2000 lbs/ton, and multiplying by the control efficiency of 99% (1-0.99). If required, compliance with this mass emission limitation shall be based on

stack testing.

b. Emission Limitation-

0.30 TPY particulate emissions

Applicable Compliance Method-
Compliance shall be determined by multiplying each 12-month summation of pigment handled by the AP-42 emission factor of 20 pounds of particulate emission/ton of pigment handled, Table 6.4-1 (1/95), dividing by 2000 lbs/ton, and multiplying by the control efficiency of 99% (1-0.99).

c. Emission Limitation-

5% visible emission, as a 6-minute average

Applicable Compliance Method-
Compliance shall be determined by visible emissions evaluations using the methods and procedures specified in USEPA Reference Method 9.

VI. Miscellaneous Requirements

None

DAP I

PTI A

Emissions Unit ID: P049

Issued: To be entered upon final issuance

B. State Only Enforceable Section

I. 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>	<u>Applicable Emissions Limitations/Control Measures</u>
P049 - CC2 Mixer Powdered Mineral Bag Dump Station		

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

NEW SOURCE REVIEW FORM B

PTI Number: 08-04233 Facility ID: 0855130356

FACILITY NAME DAP Inc

FACILITY DESCRIPTION adhesive and paint packaging lines and paint mixer; 3 powdered mineral bag dump stations. CITY/TWP Tipp City

SIC CODE 2851 SCC CODE 30101401 EMISSIONS UNIT ID P005

EMISSIONS UNIT DESCRIPTION Let-down Paint Tanks 220, 221, 222, 227, and 229

DATE INSTALLED 4/97

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	lb/hr	3.42	3.92	3.42	3.92
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: Compliance with the limitations specified in the permit, record keeping, and reporting

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 NOIDENTIFY THE AIR CONTAMINANTS: Toluene and Methanol

NEW SOURCE REVIEW FORM B

PTI Number: 08-04233

Facility ID: 0855130356

FACILITY NAME DAP Inc

FACILITY DESCRIPTION adhesive and naint packaging lines and CITY/TWP Timn Citv

Emissions Unit ID: P049

SIC CODE 2851 SCC CODE 30101401 EMISSIONS UNIT ID P012

EMISSIONS UNIT DESCRIPTION No. 1 and No. 2 Cowles Small Paint Mixers

DATE INSTALLED 4/97

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	lbs/hr	1.28	5.56	1.28	5.56
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NPSPS? NESHAP? PSD? OFFSET POLICY?

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

Enter Determination: Compliance with the limitations specified in the permit, record keeping, and reporting

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: Toluene

NEW SOURCE REVIEW FORM B

PTI Number: 08-04233

Facility ID: 0855130356

FACILITY NAME DAP Inc

FACILITY DESCRIPTION adhesive and naint packaging lines and CITY/TWP Timn Citv

Emissions Unit ID: P049

SIC CODE 2851 SCC CODE 30101401 EMISSIONS UNIT ID P039

EMISSIONS UNIT DESCRIPTION Aerosol Charger for the Charging of Aerosol Cans with Propellant

DATE INSTALLED 4/97

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	lbs/hr	0.60	2.62	0.60	2.62
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NPS? NESHAP? PSD? OFFSET POLICY?

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

Enter Determination: Compliance with the limitations specified in the permit, record keeping, and reporting

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? no

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

TOXIC AIR CONTAMINANTS

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

AIR TOXICS MODELING PERFORMED*? YES NO

IDENTIFY THE AIR CONTAMINANTS:

NEW SOURCE REVIEW FORM B

PTI Number: 08-04233

Facility ID: 0855130356

FACILITY NAME DAP Inc

FACILITY DESCRIPTION adhesive and naint packaging lines and CITY/TWP Timn Citv

Emissions Unit ID: P049

SIC CODE 2851 SCC CODE 30101401 EMISSIONS UNIT ID P040

EMISSIONS UNIT DESCRIPTION Daptex Charger for the Charging of Aerosol Cans with Propellant

DATE INSTALLED 4/97

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	lbs/hr	0.51	2.24	0.51	2.24
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NPSPS? NESHAP? PSD? OFFSET POLICY?

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

Enter Determination: Compliance with the limitations specified in the permit, record keeping, and reporting

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? no

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

TOXIC AIR CONTAMINANTS

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

AIR TOXICS MODELING PERFORMED*? YES NO

IDENTIFY THE AIR CONTAMINANTS:

NEW SOURCE REVIEW FORM B

PTI Number: 08-04233

Facility ID: 0855130356

FACILITY NAME DAP Inc

FACILITY DESCRIPTION adhesive and naint packaging lines and CITY/TWP Timn Citv

Emissions Unit ID: P049

SIC CODE 2851 SCC CODE 30101401 EMISSIONS UNIT ID P041

EMISSIONS UNIT DESCRIPTION Large Elgin Can Filler Located at the Contact Cements Packaging LINE

DATE INSTALLED 4/97

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	lbs/hr	5.7	11.40	5.7	11.40
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: compliance with the limitations specified in the permit, record keeping, and reportingIS 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 NOIDENTIFY THE AIR CONTAMINANTS: MEK and Toluene

NEW SOURCE REVIEW FORM B

PTI Number: 08-04233

Facility ID: 0855130356

FACILITY NAME DAP Inc

FACILITY DESCRIPTION adhesive and naint packaging lines and CITY/TWP Timm City

Emissions Unit ID: P049

SIC CODE 2851

SCC CODE 30101401

EMISSIONS UNIT ID P042

EMISSIONS UNIT DESCRIPTION Small Elgin Can Filler located at the Packaging Line for Contact Cements and Mastics

DATE INSTALLED 4/97

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	lbs/hr	4.8	11.40	4.8	11.40
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: compliance with the limitations specified in the permit, record keeping, and reportingIS 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 NOIDENTIFY THE AIR CONTAMINANTS: Toluene, Hexane, Methanol, and MEK

NEW SOURCE REVIEW FORM B

PTI Number: 08-04233

Facility ID: 0855130356

FACILITY NAME DAP Inc

FACILITY DESCRIPTION adhesive and naint packaging lines and CITY/TWP Timm Citv

Emissions Unit ID: P049

SIC CODE 2851

SCC CODE 30101401

EMISSIONS UNIT ID P043

EMISSIONS UNIT DESCRIPTION 55-Gallon Drum Filler located at the Packaging Line for Contact Cements

DATE INSTALLED 4/97

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	lbs/hr	4.8	21.12	4.8	21.12
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: compliance with the limitations specified in the permit, record keeping, and reportingIS 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 NOIDENTIFY THE AIR CONTAMINANTS: Toluene, Hexane, Methylene Chloride

NEW SOURCE REVIEW FORM B

PTI Number: 08-04233

Facility ID: 0855130356

FACILITY NAME DAP Inc

FACILITY DESCRIPTION adhesive and naint packaging lines and CITY/TWP Timn Citv

Emissions Unit ID: P049

SIC CODE 2851

SCC CODE 30101401

EMISSIONS UNIT ID P044

EMISSIONS UNIT DESCRIPTION 5-Gallon Pail Filler located at the Packaging Line for Contact Cements

DATE INSTALLED 4/97

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	lbs/hr	5.4	7.89	5.4	7.89
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: Compliance with the limitations specified in the permit, record keeping, and reportingIS 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 NOIDENTIFY THE AIR CONTAMINANTS: methylene chloride, hexane, toluene MEK

NEW SOURCE REVIEW FORM B

PTI Number: 08-04233

Facility ID: 0855130356

FACILITY NAME DAP Inc

FACILITY DESCRIPTION adhesive and naint packaging lines and CITY/TWP Timn Citv

Emissions Unit ID: P049

SIC CODE 2851

SCC CODE 30101401

EMISSIONS UNIT ID P045

EMISSIONS UNIT DESCRIPTION 4-Stem Prosys Filler

DATE INSTALLED 4/97

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	lbs/hr	2.84	12.7	2.84	12.7
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: Compliance with the limitations specified in the permit, record keeping, and reportingIS 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 NOIDENTIFY THE AIR CONTAMINANTS: Toluene and Hexane

NEW SOURCE REVIEW FORM B

PTI Number: 08-04233

Facility ID: 0855130356

FACILITY NAME DAP Inc

FACILITY DESCRIPTION adhesive and naint packaging lines and CITY/TWP Timn Citv

Emissions Unit ID: P049

SIC CODE 2851 SCC CODE 30101401 EMISSIONS UNIT ID P046

EMISSIONS UNIT DESCRIPTION 3-Stem Prosys Filler

DATE INSTALLED 9/97

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	lbs/hr	5.16	13.24	5.16	13.24
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: Compliance with the limitations specified in the permit, record keeping, reporting

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: Toluene, Hexane

NEW SOURCE REVIEW FORM B

PTI Number: 08-04233

Facility ID: 0855130356

FACILITY NAME DAP Inc

FACILITY DESCRIPTION adhesive and naint packaging lines and CITY/TWP Timn Citv

Emissions Unit ID: P049

SIC CODE 2851 SCC CODE 30101402 EMISSIONS UNIT ID P047

EMISSIONS UNIT DESCRIPTION CC1 Mixer Powdered Mineral Bag Dump Station

DATE INSTALLED 4/97

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	lbs/hr	0.20	0.30	0.20	0.30
PM ₁₀					
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NPS? NESHAP? PSD? OFFSET POLICY?

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

Enter Determination: compliance with the limitations specified in the permit, control by a baghouse, record keeping, reporting

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? no

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

TOXIC AIR CONTAMINANTS

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

AIR TOXICS MODELING PERFORMED*? YES NO

IDENTIFY THE AIR CONTAMINANTS:

NEW SOURCE REVIEW FORM B

PTI Number: 08-04233

Facility ID: 0855130356

FACILITY NAME DAP Inc

FACILITY DESCRIPTION adhesive and naint packaging lines and CITY/TWP Timn Citv

Emissions Unit ID: P049

SIC CODE 2851 SCC CODE 30101402 EMISSIONS UNIT ID P048

EMISSIONS UNIT DESCRIPTION Mastic Mixer Powdered Mineral Bag Dump Station

DATE INSTALLED 9/97

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	lbs/hr	0.20	0.30	0.20	0.30
PM ₁₀					
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

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

Enter Determination: compliance with the limitations specified in the permit, control by a baghouse, record keeping, and reporting

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? no

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

TOXIC AIR CONTAMINANTS

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

AIR TOXICS MODELING PERFORMED*? YES NO

IDENTIFY THE AIR CONTAMINANTS:

12 NEW SOURCE REVIEW FORM B

PTI Number: 08-04233

Facility ID: 0855130356

FACILITY NAME DAP Inc

FACILITY DESCRIPTION adhesive and naint packaging lines and CITY/TWP Timn Citv

Emissions Unit ID: P049

SIC CODE 2851 SCC CODE 30101402 EMISSIONS UNIT ID P049

EMISSIONS UNIT DESCRIPTION CC2 Mixer Powdered Mineral Bag Dump Station

DATE INSTALLED 9/97

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	lb/hr	0.20	0.30	0.20	0.30
PM ₁₀					
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

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

Enter Determination: Compliance with limitations specified in the permit, control by a baghouse, record keeping, reporting

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? no

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

TOXIC AIR CONTAMINANTS

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

AIR TOXICS MODELING PERFORMED*? YES NO

IDENTIFY THE AIR CONTAMINANTS:

NEW SOURCE REVIEW FORM B

PTI Number: 08-04233

Facility ID: 0855130356

FACILITY NAME DAP Inc

FACILITY DESCRIPTION adhesive and naint packaging lines and CITY/TWP Timn Citv

Emissions Unit ID: P049

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"/>	0000000c.wpd	<input type="checkbox"/>	
<u>Modeling form/results</u>	<input type="checkbox"/>	0000000s.wpd	<input checked="" 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

DAP Inc has submitted a request to obtain a PTI for the emissions units located on the "paint" side of the facility. These emissions units are located at a Title V facility for HAPs.

This PTI includes permitting for mixing tanks and packaging lines. In addition, this PTI includes three particulate emissions units for the handling of pigment. Particulate emission calculations were determined by AP-42 emission factors.

DAP has requested the flexibility to package or mix photochemically reactive materials in these emissions units. Therefore, if the potential OC emissions for each emission unit have been determined greater than 8 lbs/hr and 40 lbs/day, the allowable emissions are clarified to specify an emission limitation for those days when photochemically reactive materials are mixed or packaged, i.e. 40 lbs/day. An emission limitation is also specified for those days when only non-photochemically reactive materials are mixed or packaged.

The OC emissions have been calculated by use of the formula in the USEPA document entitled, "USEPA Emission Inventory Improvement Program Volume II: Chapter 8, Preferred and Alternative Methods for Estimating Air Emissions for Paint and Ink Manufacturing Facilities," March 1998. If applicable, emissions occurring from displacement, evaporation, heat-up, and point source were calculated. DAP has provided spreadsheets with all the required information. In most cases, only the displacement emissions are applicable to the emission unit. DAP will be required to maintain records to accumulate all the required information to calculate daily and average hourly OC emission rates.

$$\text{Displacement} = (0.01246)(S)(P)(MW)(Q)/T$$

Where:

P = vapor pressure of material loaded

S = 0.5 on the basis that the material is loaded into a

NEW SOURCE REVIEW FORM B

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FACILITY NAME DAP Inc

FACILITY DESCRIPTION adhesive and naint packaging lines and CITY/TWP Timn Citv

Emissions Unit ID: P049

clean container

MW = vapor molecular weight (lb/lb-mole)

Q = volume of material loaded (gal)

T = temperature (R)

$$\text{Evaporation} = (MW)(K)(A)(P)3600/(R)(T)$$

Where:

$$K = (0.00438)(U^{0.78})[(18/MW)^{.33}]$$

U = 0.1 mile per hour from USEPA example

R = universal gas constant, (10.73

psia)(ft³)/(lbmole)(R)

A = open area of tank

$$\text{Point Source} = (Ed)(Qex)(Tex)/\text{Batch volume}$$

Where:

Qex = volumetric exhaust rate measured at 24.23 gal/min

Tex = time exhaust fan is running during dries addition (assume 5 min per batch)

$$\text{Heat Up} = [(P_{xT1}/14.7 - P_{xT1}) + (P_{xT2}/14.7 - P_{xT2})] / (2)(\Delta n)(MW)$$

Where:

$$\Delta n = (V/R)(P_{a1}/T_1 - P_{a2}/T_2) = \text{lb-moles of gas displaced}$$
P_x = partial pressure of each VOC in vessel headspace (psia)P_a = gas pressure in vessel (psia)T₁ = initial gas temperature (R)T₂ = final gas temperature (R)

*A 20 degree temperature gradient is assumed for heat-up

P005: (Let-down tanks) This emission unit includes tanks 220, 221, 222, 227, and 229. These are let-down and are primarily used for the mixing and storage of paints. These units were operating under a PTO but a PTI was not issued. The tanks were installed in 1997. The emissions were calculated, based on worst case conditions, and 8760 hrs/yr. Maximum throughput for all tanks has been determined as 182,236 gallons. Emissions have been calculated by assuming worst case conditions (formulation with highest product when the molecular weight and vapor pressure are multiplied together). Emissions have been determined as 2.31 lbs OC/hr, 17.28 lbs OC/day, and 3.2 TPY OC. The calculated emissions are less than 8 lbs/hr and 40 lbs/day; therefore, language specifying limitations during the use of photochemically reactive materials is not required. These units are combined. Each let-down tank, by itself, would be considered de minimis. Record keeping will be required to demonstrate compliance on a daily basis. The formulas for displacement, evaporation, point source, and heat-up losses were determined.

P012: (No 1 and No 2 Small Paint Mixers) This emission unit includes two paint mixers. The emissions were calculated, based on worst case conditions, and 8760 hrs/yr. The paint formulation containing the highest

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product when the molecular weight and vapor pressure are multiplied together was used to determine the allowable emissions. Emissions have been determined as 1.28 lbs OC/hr, 30.72 lbs OC/day, and 5.60 TPY OC. The calculated emissions are less than 8 lbs/hr and 40 lbs/day; therefore, language specifying limitations during the use of photochemically reactive materials is not required. Daily record keeping will be required to demonstrate compliance on a daily basis. The formulas for displacement, evaporation, point source, and heat-up losses were determined.

P039: (Aerosol Charger) Emissions were calculated based on loss per can information which was supplied by the manufacturer of the aerosol charger. The loss per can is equal to 0.08 cc/can. The allowable emissions have been calculated based on the maximum number of cans filled/day (126,964 cans/day) The emissions have been calculated as 0.60 lb OC/hr, 14.41 lbs/day, and 2.62 TPY. The calculated emissions are less than 8 lbs/hr and 40 lbs/day; therefore, language specifying limitations during the use of photochemically reactive materials is not required.

P040: (Daptex Charger) Emissions were calculated based on loss per can information which was supplied by the manufacturer of the Daptex charger. The loss per can is equal to 0.16 cc/can. The allowable emissions have been calculated based on the maximum number of cans filled/day (65,245 cans/day) The emissions have been calculated as 0.51 lb OC/hr, 12.27 lbs/day, and 2.24 TPY. The calculated emissions are less than 8 lbs/hr and 40 lbs/day; therefore, language specifying limitations during the use of photochemically reactive materials is not required.

P041: (Large Elgin Can Filler) Photochemically reactive materials are used in this process. When PR materials are processed, emissions will be restricted to less than 5.71 lbs/hr and 40 lbs/day. Compliance will be determined by record keeping, on a daily basis. Emission calculations were determined by displacement losses. When non-photochemically reactive materials are used, emission limitations are equal to 5.71 lbs/hr, 62.50 lbs/day and 11.40 TPY.

P042: (Small Elgin Can Filler) Photochemically reactive materials are used in this process. When PR materials are processed, emissions will be restricted to less than 4.8 lbs/hr and 40 lbs/day. Compliance will be determined by record keeping, on a daily basis. Emission calculations were determined by displacement losses. When non-PR materials are packaged, emissions shall be limited to 4.8 lbs/hr, 62.50 lbs/day, and 11.40 TPY.

P043: (55-Gallon drum filler) The daily emissions exceed 40 lbs/day. However, generally only non-photochemically reactive materials are packaged on this Line. DAP has requested the flexibility to package photochemically reactive materials. Additional record keeping will be required to demonstrate compliance with the 40 lb/day limitation. Two daily limitations have been incorporated into the permit: one for days when only non-photochemically reactive material is packaged (4.76 lbs/hr, 115.72 lbs/day) and one when photochemically reactive material is packaged (4.76 lbs/hr, 40.0 lbs/day). Emission calculations were determined by displacement losses.

P044: (5 gallon pail filler) Photochemically reactive materials are used in this process. Emissions will be restricted to less than 5.4 lbs/hr and 40 lbs/day when PR material is used. When only non-PRM are packaged, emissions shall not exceed 5.4 lbs/hr, 43.26 lbs/day, and 7.89 TPY. Compliance will be determined by record keeping, on a daily basis. Emission calculations were determined by displacement losses.

P045: (4-Stem Prosys) The daily emissions exceed 40 lbs/day. However, generally only non-photochemically

FACILITY DESCRIPTION

adhesive and paint packaging lines and
paint mixer; 3 powdered mineral bag dump
stations.

CITY/TWP

Tipp City

reactive materials are packaged on this Line. DAP has requested the flexibility to package photochemically reactive materials. Additional record keeping will be required to demonstrate compliance with the 40 lb/day limitation. Two daily limitations have been incorporated into the permit: one for days when only non-photochemically reactive material is packaged (2.84 lbs/hr, 69.62 lbs/day, and 12.70 TPY) and one when photochemically reactive material is packaged (2.84 lbs/hr, 40.0 lbs/day). Emission calculations were determined by displacement losses.

P046:(3-Stem Prosys) The daily emissions exceed 40 lbs/day. However, generally only non-photochemically reactive materials are packaged on this Line. DAP has requested the flexibility to package photochemically reactive materials. Additional record keeping will be required to demonstrate compliance with the 40 lb/day limitation. Two daily limitations have been incorporated into the permit: one for days when only non-photochemically reactive material is packaged (5.16 lbs/hr, 72.54 lbs/day) and one when photochemically reactive material is packaged (5.16 lbs/hr and 40 lbs/day). Emission calculations were determined by displacement losses.

P047: (Mineral Bag Dump Station) Emissions have been calculated based on the AP-42 emission factor, Table 6.4-1. This emission unit requires a permit to install because the potential emissions (no control and 8760 hrs/yr) are equal to 24.53 TPY. Baghouse control is 99% BAT is considered baghouse control, 5% VE and pressure drop record keeping.

P049 : (Mineral Bag Dump Station) Emissions have been calculated based on the AP-42 emission factor, Table 6.4-1. This emission unit requires a permit to install because the potential emissions (no control and 8760 hrs/yr) are equal to 24.53 TPY. Baghouse control is 99% BAT is considered baghouse control, 5% VE and pressure drop record keeping.

P048: (Mastic Mixer Powdered Mineral Dump Station) Emissions have been calculated based on the AP-42 emission factor, Table 6.4-1. This emission unit requires a permit to install because the potential emissions (no control and 8760 hrs/yr) are equal to 24.53 TPY. Baghouse control is 99% BAT is considered baghouse control, 5% VE and pressure drop record keeping.

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

B. Facility Emissions and Attainment Status

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PTI Number: 08-04233

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FACILITY DESCRIPTION adhesive and naint packaging lines and CITY/TWP Timn Citv

Emissions Unit ID: P049

C. Source Emissions

D. Conclusion

PLEASE PROVIDE ADDITIONAL NOTES OR COMMENTS AS NECESSARY:

NONE

Please complete:

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

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	91.41
Particulates	0.90