



John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

6/4/2013

Michael Summers  
Akron Paint and Varnish  
1390 Firestone Parkway  
Akron, OH 44301

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 1677010028  
Permit Number: P0112632  
Permit Type: Renewal  
County: Summit

Certified Mail

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

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

**How to appeal this permit**

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

Environmental Review Appeals Commission  
77 South High Street, 17th Floor  
Columbus, OH 43215

## **How to save money, reduce pollution and reduce energy consumption**

The Ohio EPA is encouraging 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 Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: [www.ohioairquality.org/clean\\_air](http://www.ohioairquality.org/clean_air)

## **How to give us feedback on your permitting experience**

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

## **How to get an electronic copy of your permit**

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Akron Regional Air Quality Management District at (330)375-2480 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael W. Ahern, Manager

Permit Issuance and Data Management Section, DAPC

Cc: ARAQMD



## Response to Comments

Facility ID:	1677010028
Facility Name:	Akron Paint and Varnish
Facility Description:	Surface Coatings Manufacturing
Facility Address:	1390 Firestone Parkway Akron, OH 44301 Summit County
Permit:	P0112632, Permit-To-Install and Operate - Renewal
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the Akron Beacon Journal on 05/03/2013. The comment period ended on 06/02/2013.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

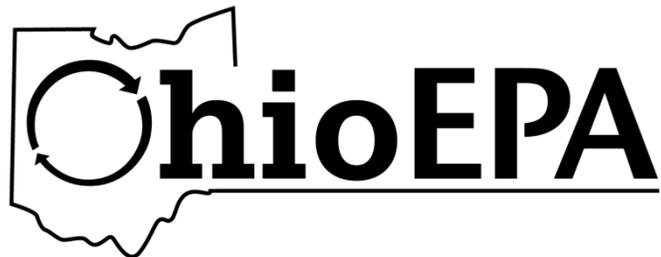
The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

**1. Topic: None**

- a. Comment: None
- b. Response: None





**FINAL**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
Akron Paint and Varnish**

Facility ID:	1677010028
Permit Number:	P0112632
Permit Type:	Renewal
Issued:	6/4/2013
Effective:	6/4/2013
Expiration:	6/4/2018





**Division of Air Pollution Control  
Permit-to-Install and Operate**

for  
Akron Paint and Varnish

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**Final Permit-to-Install and Operate**  
Akron Paint and Varnish  
**Permit Number:** P0112632  
**Facility ID:** 1677010028  
**Effective Date:** 6/4/2013

## Authorization

Facility ID: 1677010028  
Application Number(s): A0046629, A0046674  
Permit Number: P0112632  
Permit Description: FEPTIO renewal for paint manufacturing facility consisting of mixers, rubber churns, mills, storage tanks, can cleaning, and a silkscreen operation - particulate emissions controlled by portable baghouses.  
Permit Type: Renewal  
Permit Fee: \$0.00  
Issue Date: 6/4/2013  
Effective Date: 6/4/2013  
Expiration Date: 6/4/2018  
Permit Evaluation Report (PER) Annual Date: Apr 1 - Mar 31, Due May 15

This document constitutes issuance to:

Akron Paint and Varnish  
1390 Firestone Parkway  
Akron, OH 44301

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

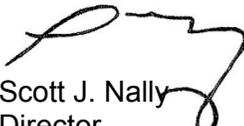
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Akron Regional Air Quality Management District  
146 South High Street, Room 904  
Akron, OH 44308  
(330)375-2480

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

  
Scott J. Nally  
Director



**Final Permit-to-Install and Operate**  
Akron Paint and Varnish  
**Permit Number:** P0112632  
**Facility ID:** 1677010028  
**Effective Date:** 6/4/2013

## Authorization (continued)

**Permit Number:** P0112632  
**Permit Description:** FEPTIO renewal for paint manufacturing facility consisting of mixers, rubber churns, mills, storage tanks, can cleaning, and a silkscreen operation - particulate emissions controlled by portable baghouses.

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

<b>Emissions Unit ID:</b>	<b>P001</b>
Company Equipment ID:	1/2 HP Air Mixer (A4)
Superseded Permit Number:	P0102589
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>R001</b>
Company Equipment ID:	Silk-Screen Operation
Superseded Permit Number:	P0102589
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>T001</b>
Company Equipment ID:	TF61 - 26,640 Gal Tank
Superseded Permit Number:	P0102589
General Permit Category and Type:	Not Applicable



**Final Permit-to-Install and Operate**  
Akron Paint and Varnish  
**Permit Number:** P0112632  
**Facility ID:** 1677010028  
**Effective Date:** 6/4/2013

## **A. Standard Terms and Conditions**



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

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

**2. Who is responsible for complying with this permit?**

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

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

**3. What records must I keep under this permit?**

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

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

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

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

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

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

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

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is



very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

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

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

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

**7. What reports must I submit under this permit?**

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

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

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

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

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

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



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

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

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

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

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

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

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

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting<sup>1</sup> a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

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

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

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



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

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

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

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

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

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



**Final Permit-to-Install and Operate**  
Akron Paint and Varnish  
**Permit Number:** P0112632  
**Facility ID:** 1677010028  
**Effective Date:** 6/4/2013

## **B. Facility-Wide Terms and Conditions**



**Final Permit-to-Install and Operate**

Akron Paint and Varnish

**Permit Number:** P0112632

**Facility ID:** 1677010028

**Effective Date:** 6/4/2013

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - (1) None.
  - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - (1) None.
2. The Ohio EPA has determined that this facility may be subject to the requirements of an area source MACT/GACT rule that the Ohio EPA does not have the delegated authority to implement. Although Ohio EPA has determined that an area source MACT (also known as the GACT) may apply, at this time Ohio EPA does not have the authority to enforce this standard. Instead, U.S. EPA has the authority to enforce this standard. Please be advised that all requirements associated with these rules are in effect and are enforceable by U.S. EPA. For more information on the area source rules, please refer to the follow U.S. EPA website: <http://www.epa.gov/ttn/atw/area/arearules.html>.



**Final Permit-to-Install and Operate**  
Akron Paint and Varnish  
**Permit Number:** P0112632  
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**Effective Date:** 6/4/2013

## **C. Emissions Unit Terms and Conditions**



**1. P001, 1/2 HP Air Mixer (A4)**

**Operations, Property and/or Equipment Description:**

1/2 HP Air Mixer (A4)

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. All.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)	Combined annual emissions from the entire facility shall not exceed the following as a rolling, 12-month summation:  99 tons of volatile organic compounds (VOC); 9.9 tons of any individual hazardous air pollutant (HAP); and 24.9 tons of combined HAPs.  See b)(2)a.
b.	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
c.	OAC rule 3745-17-11(B)	PE shall not exceed 0.551 pound per hour.



- (2) Additional Terms and Conditions
- a. This facility has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summations of the emissions, upon issuance of this permit.
  - b. Any baghouse associated with this emissions unit, or any other emissions units at the entire facility, shall be in full operation and effectively capturing particulate emissions whenever the associated emissions unit is in operation.
- c) Operational Restrictions
- (1) None.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall maintain the following records on a daily basis for the mixers, mills, churns, silk-screen printing, and manual can washer:
    - a. The product name and batch ticket number for each batch produced at the facility;
    - b. The volume of each batch, and total volume of mill wash used, in gallons;
    - c. The total quantity of each VOC & HAP-containing material used, in pounds;
    - d. The VOC & HAP content of each VOC & HAP-containing material used, as a weight fraction;
    - e. The mass of evaporative loss of VOC & HAP from each VOC & HAP containing material used, in pounds, i.e.,  $(d)(1)c.) \times (d)(1)d.) \times (0.015)^*$ ; and
    - f. The calculated daily VOC & HAP emissions from all VOC & HAP-containing materials, in pounds, i.e., the sum of the values recorded in d)(1)e.
- \*The emission factor for batch process emissions utilized in this permit is equivalent to the 30 pounds VOC per ton of product emission factor in AP-42, but integrates more readily into the permittee's emission tracking system than the AP-42 factor. Therefore, it is used in lieu of the AP-42 factor.
- (2) The permittee shall calculate and record the VOC & HAP emissions from all storage tanks for each month, using the latest version of USEPA's "Tanks Program" software.
  - (3) The permittee shall calculate and record the following, for the entire facility, on a monthly basis:
    - a. The total individual HAP emissions and the rolling 12-month summation of the individual HAP emissions from the entire facility;
    - b. The total combined HAP emissions and the rolling 12-month summation of the combined HAP emissions from the entire facility; and



- c. The total VOC emissions and the rolling 12-month summation of the total VOC emissions from the entire facility.

These records shall be generated in accordance with sections d)(1) – d)(2) of these terms and conditions.

- (4) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from this emissions unit and associated baghouse, or any other emissions units with associated baghouses. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emissions incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
  - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:



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- ii. all exceedances of the rolling, 12-month emission limitation for VOC;
  - iii. all exceedances of the rolling, 12-month emission limitation for individual HAP; and
  - iv. all exceedances of the rolling, 12-month emission limitation for total combined HAPs.
- b. the probable cause of each deviation (excursion);
  - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
  - d. the magnitude and duration of each deviation (excursion).

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

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
  - (3) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(4) above:
    - a. all days during which any visible particulate emissions were observed from this emissions unit and associated baghouse, or any other emissions units with associated baghouses; and
    - b. any corrective actions taken to minimize or eliminate the visible particulate emissions.
- f) Testing Requirements
- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:



a. Emission Limitation:

99 tons of VOC (facility-wide)

Applicable Compliance Method:

Compliance with the annual VOC emission limitation shall be demonstrated by the summation of the following emissions:

- i. VOC emissions from the storage tanks shall be determined monthly using the latest version of USEPA's "Tanks Program" software.
- ii. VOC emissions from can washing shall be determined monthly, based upon the recorded mill wash usage. The amount of VOC lost to atmosphere through evaporation shall be assumed to be 1.5% of total mill wash VOC content employed.
- iii. VOC emissions from mixers, churns, mills, and similar sources shall be determined monthly by recording VOC employed through the use of batch tickets. The amount of VOC lost to atmosphere through evaporation shall be assumed to be 1.5% of the VOC content employed.

Formulation data or USEPA Method 24 shall be used to determine the VOC content of the mill wash, tank contents, screen printing coatings, and batch ingredients.

b. Emission Limitations:

9.9 tons of any individual HAP (facility-wide)

24.9 tons of combined HAPs (facility-wide)

Applicable Compliance Method:

Compliance with the annual HAP emission limitations shall be demonstrated by the summation of the following emissions:

- i. HAP emissions from the storage tanks shall be determined monthly using the latest version of USEPA's "Tanks Program" software.
- ii. HAP emissions from can washing shall be determined monthly, based upon the recorded mill wash usage. The amount of HAP lost to atmosphere through evaporation shall be assumed to be 1.5% of total mill wash HAP content employed.
- iii. HAP emissions from mixers, churns, mills, and similar sources shall be determined monthly by recording HAP employed through the use of batch tickets. The amount of HAP lost to atmosphere through evaporation shall be assumed to be 1.5% of the HAP content employed.



To determine total combined HAP emissions, sum the calculated annual emission rates for each individual HAP.

Formulation data shall be used to determine the HAP content of the mill wash, tank contents, screen printing coatings, and batch ingredients.

c. Emission Limitation:

Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance with the visible PE limitation shall be demonstrated through the results of visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

d. Emission Limitation:

PE shall not exceed 0.551 pound per hour.

Applicable Compliance Method:

If required, compliance shall be demonstrated based on the results of stack testing performed in accordance with Methods 1 - 5 of 40 CFR Part 60, Appendix A.

g) Miscellaneous Requirements

(1) None.



**2. R001, Silk-Screen Operation**

**Operations, Property and/or Equipment Description:**

Silk-Screen Printing Operation

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 16-02200)	Organic compound (OC) emissions shall not exceed the following:  8.0 pounds per hour; 40 pounds per day; and 7.3 tons per year.
b.	OAC rule 3745-31-05(D)	Combined annual emissions from the entire facility shall not exceed the following as a rolling, 12-month summation:  99 tons of volatile organic compounds (VOC); 9.9 tons of any individual hazardous air pollutant (HAP); and 24.9 tons of combined HAPs.  See b)(2)a.



- (2) Additional Terms and Conditions
  - a. This facility has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summations of the emissions, upon issuance of this permit.
- c) Operational Restrictions
  - (1) The permittee shall only employ natural gas as a fuel in the curing oven.
- d) Monitoring and/or Recordkeeping Requirements
  - (1) The permittee shall maintain daily records of the following for each day the silk-screen equipment is in operation:
    - a. The company identification for each ink and cleanup material employed;
    - b. The number of gallons of each ink and cleanup material employed;
    - c. The number of hours of operation;
    - d. The OC content of each ink and cleanup material employed;
    - e. The total OC emission rate for all inks and cleanup materials, in pounds per day; and
    - f. The average hourly OC emission rate for all inks and cleanup materials, i.e., (d)/(e), in pounds per hour (average).
  - (2) The permittee shall maintain the following records on a daily basis for the mixers, mills, churns, silk-screen printing, and manual can washer:
    - a. The product name and batch ticket number for each batch produced at the facility;
    - b. The volume of each batch, and total volume of mill wash used, in gallons;
    - c. The total quantity of each VOC & HAP-containing material used, in pounds;
    - d. The VOC & HAP content of each VOC & HAP-containing material used, as a weight fraction;
    - e. The mass of evaporative loss of VOC & HAP from each VOC & HAP containing material used, in pounds, i.e., (d)(2)c.)x(d)(2)d.)x(0.015)\*; and
    - f. The calculated daily VOC & HAP emissions from all VOC & HAP-containing materials, in pounds, i.e., the sum of the values recorded in d)(2)e.

\*The emission factor for batch process emissions utilized in this permit is equivalent to the 30 pounds VOC per ton of product emission factor in AP-42, but integrates more



readily into the permittee's emission tracking system than the AP-42 factor. Therefore, it is used in lieu of the AP-42 factor.

- (3) The permittee shall calculate and record the VOC & HAP emissions from all storage tanks for each month, using the latest version of USEPA's "Tanks Program" software.
- (4) The permittee shall calculate and record the following, for the entire facility, on a monthly basis:
  - a. The total individual HAP emissions and the rolling 12-month summation of the individual HAP emissions from the entire facility;
  - b. The total combined HAP emissions and the rolling 12-month summation of the combined HAP emissions from the entire facility; and
  - c. The total VOC emissions and the rolling 12-month summation of the total VOC emissions from the entire facility.

These records shall be generated in accordance with sections d)(2) – d)(3) of these terms and conditions.

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
  - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
    - i. all exceedances of the rolling, 12-month emission limitation for VOC;
    - ii. all exceedances of the rolling, 12-month emission limitation for individual HAP;and
    - iii. all exceedances of the rolling, 12-month emission limitation for total combined HAPs.
  - b. the probable cause of each deviation (excursion);
  - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and



- d. the magnitude and duration of each deviation (excursion).

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

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) **Testing Requirements**

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

- a. Emission Limitations:

OC emissions shall not exceed the following:

8.0 pounds per hour;

40 pounds per day; and

7.3 tons per year.

Applicable Compliance Method:

Compliance with the hourly and daily emission limitations shall be demonstrated bases on the record keeping requirements in section d)(1).

The annual emission limitation was developed by multiplying the daily mass emission limitation by 365 days per year, and then dividing by 2000. Therefore, compliance with the annual limitation shall be demonstrated if compliance with the daily limitation is maintained.

- b. Emission Limitation:

99 tons of VOC (facility-wide)

Applicable Compliance Method:

Compliance with the annual VOC emission limitation shall be demonstrated by the summation of the following emissions:



- i. VOC emissions from the storage tanks shall be determined monthly using the latest version of USEPA's "Tanks Program" software.
- ii. VOC emissions from can washing shall be determined monthly, based upon the recorded mill wash usage. The amount of VOC lost to atmosphere through evaporation shall be assumed to be 1.5% of total mill wash VOC content employed.
- iii. VOC emissions from mixers, churns, mills, and similar sources shall be determined monthly by recording VOC employed through the use of batch tickets. The amount of VOC lost to atmosphere through evaporation shall be assumed to be 1.5% of the VOC content employed.

Formulation data or USEPA Method 24 shall be used to determine the VOC content of the mill wash, tank contents, screen printing coatings, and batch ingredients.

c. Emission Limitations:

9.9 tons of any individual HAP (facility-wide)

24.9 tons of combined HAPs (facility-wide)

Applicable Compliance Method:

Compliance with the annual HAP emission limitations shall be demonstrated by the summation of the following emissions:

- i. HAP emissions from the storage tanks shall be determined monthly using the latest version of USEPA's "Tanks Program" software.
- ii. HAP emissions from can washing shall be determined monthly, based upon the recorded mill wash usage. The amount of HAP lost to atmosphere through evaporation shall be assumed to be 1.5% of total mill wash HAP content employed.
- iii. HAP emissions from mixers, churns, mills, and similar sources shall be determined monthly by recording HAP employed through the use of batch tickets. The amount of HAP lost to atmosphere through evaporation shall be assumed to be 1.5% of the HAP content employed.

To determine total combined HAP emissions, sum the calculated annual emission rates for each individual HAP.

Formulation data shall be used to determine the HAP content of the mill wash, tank contents, screen printing coatings, and batch ingredients.

g) Miscellaneous Requirements

- (1) None.



**3. T001, TF61 - 26,640 Gal Tank**

**Operations, Property and/or Equipment Description:**

TF61 - 26,640 Gal Tank

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-21-09(L)(2)	Exempt.  Tank capacity is less than 40,000 gallons.
b.	OAC rule 3745-31-05(D)	Combined annual emissions from the entire facility shall not exceed the following as a rolling, 12-month summation:  99 tons of volatile organic compounds (VOC); 9.9 tons of any individual hazardous air pollutant (HAP); and 24.9 tons of combined HAPs.  See b)(2)a.



- (2) Additional Terms and Conditions
  - a. This facility has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summations of the emissions, upon issuance of this permit.
- c) Operational Restrictions
  - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
  - (1) The permittee shall maintain the following records on a daily basis for the mixers, mills, churns, silk-screen printing, and manual can washer:
    - a. The product name and batch ticket number for each batch produced at the facility;
    - b. The volume of each batch, and total volume of mill wash used, in gallons;
    - c. The total quantity of each VOC & HAP-containing material used, in pounds;
    - d. The VOC & HAP content of each VOC & HAP-containing material used, as a weight fraction;
    - e. The mass of evaporative loss of VOC & HAP from each VOC & HAP containing material used, in pounds, i.e.,  $(d)(1)c.) \times (d)(1)d.) \times (0.015)^*$ ; and
    - f. The calculated daily VOC & HAP emissions from all VOC & HAP-containing materials, in pounds, i.e., the sum of the values recorded in d)(1)e.

\*The emission factor for batch process emissions utilized in this permit is equivalent to the 30 pounds VOC per ton of product emission factor in AP-42, but integrates more readily into the permittee's emission tracking system than the AP-42 factor. Therefore, it is used in lieu of the AP-42 factor.

  - (2) The permittee shall calculate and record the VOC & HAP emissions from all storage tanks for each month, using the latest version of USEPA's "Tanks Program" software.
  - (3) The permittee shall calculate and record the following, for the entire facility, on a monthly basis:
    - a. The total individual HAP emissions and the rolling 12-month summation of the individual HAP emissions from the entire facility;
    - b. The total combined HAP emissions and the rolling 12-month summation of the combined HAP emissions from the entire facility; and
    - c. The total VOC emissions and the rolling 12-month summation of the total VOC emissions from the entire facility.



These records shall be generated in accordance with sections d)(1) – d)(2) of these terms and conditions.

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

(2) The permittee shall submit quarterly deviation (excursion) reports that identify:

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. all exceedances of the rolling, 12-month emission limitation for VOC;

ii. all exceedances of the rolling, 12-month emission limitation for individual HAP;and

iii. all exceedances of the rolling, 12-month emission limitation for total combined HAPs.

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

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

The quarterly reports shall be submitted,electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

(3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.



f) Testing Requirements

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

a. Emission Limitation:

99 tons of VOC (facility-wide)

Applicable Compliance Method:

Compliance with the annual VOC emission limitation shall be demonstrated by the summation of the following emissions:

- i. VOC emissions from the storage tanks shall be determined monthly using the latest version of USEPA's "Tanks Program" software.
- ii. VOC emissions from can washing shall be determined monthly, based upon the recorded mill wash usage. The amount of VOC lost to atmosphere through evaporation shall be assumed to be 1.5% of total mill wash VOC content employed.
- iii. VOC emissions from mixers, churns, mills, and similar sources shall be determined monthly by recording VOC employed through the use of batch tickets. The amount of VOC lost to atmosphere through evaporation shall be assumed to be 1.5% of the VOC content employed.

Formulation data or USEPA Method 24 shall be used to determine the VOC content of the mill wash, tank contents, screen printing coatings, and batch ingredients.

b. Emission Limitations:

9.9 tons of any individual HAP (facility-wide)

24.9 tons of combined HAPs (facility-wide)

Applicable Compliance Method:

Compliance with the annual HAP emission limitations shall be demonstrated by the summation of the following emissions:

- i. HAP emissions from the storage tanks shall be determined monthly using the latest version of USEPA's "Tanks Program" software.
- ii. HAP emissions from can washing shall be determined monthly, based upon the recorded mill wash usage. The amount of HAP lost to atmosphere through evaporation shall be assumed to be 1.5% of total mill wash HAP content employed.



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- iii. HAP emissions from mixers, churns, mills, and similar sources shall be determined monthly by recording HAP employed through the use of batch tickets. The amount of HAP lost to atmosphere through evaporation shall be assumed to be 1.5% of the HAP content employed.

To determine total combined HAP emissions, sum the calculated annual emission rates for each individual HAP.

Formulation data shall be used to determine the HAP content of the mill wash, tank contents, screen printing coatings, and batch ingredients.

g) Miscellaneous Requirements

- (1) None.