



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

7/19/2013

Mr. Jeff Lasselle
PLASTI-KOTE CO., INC.
1000 Lake Rd
Medina, OH 44256

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 1652050060
Permit Number: P0114990
Permit Type: Administrative Modification
County: Medina

Certified Mail

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	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

How to give us feedback on your permitting experience

Please complete a survey at 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 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



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
PLASTI-KOTE CO., INC.**

Facility ID:	1652050060
Permit Number:	P0114990
Permit Type:	Administrative Modification
Issued:	7/19/2013
Effective:	7/19/2013
Expiration:	3/8/2015



Division of Air Pollution Control
Permit-to-Install and Operate
for
PLASTI-KOTE CO., INC.

Table of Contents

Authorization	1
A. Standard Terms and Conditions	4
1. What does this permit-to-install and operate ("PTIO") allow me to do?.....	5
2. Who is responsible for complying with this permit?	5
3. What records must I keep under this permit?	5
4. What are my permit fees and when do I pay them?.....	5
5. When does my PTIO expire, and when do I need to submit my renewal application?	5
6. What happens to this permit if my project is delayed or I do not install or modify my source?	6
7. What reports must I submit under this permit?	6
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?	6
9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? ...	6
10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?	7
11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?	7
12. What happens if one or more emissions units operated under this permit is/are shut down permanently?	7
13. Can I transfer this permit to a new owner or operator?.....	8
14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?	8
15. What happens if a portion of this permit is determined to be invalid?	8
B. Facility-Wide Terms and Conditions.....	9
C. Emissions Unit Terms and Conditions	15
1. P021, Degassing Booth	16
2. P060, Ball Mill	18
3. Emissions Unit Group -Filling Lines: P002,P003,P004,P005,.....	23
4. Emissions Unit Group -Paint Mixing Stations: P022,P023,P024,.....	25
5. Emissions Unit Group -Sand Mills: P061,P062,P063,	30



Authorization

Facility ID: 1652050060
Application Number(s): M0002264
Permit Number: P0114990
Permit Description: Administrative modification of Permit to Install and Operate P0105566 issued final on March 8, 2010 to change the emission factor for calculating the emissions from the gas house of emissions units P002, P003 and P004 based on results of stack test conducted on April 18, 2013 and to modify the terms and conditions of the record keeping for emissions unit R007 in the Facility-Wide Terms and Conditions.
Permit Type: Administrative Modification
Permit Fee: \$0.00
Issue Date: 7/19/2013
Effective Date: 7/19/2013
Expiration Date: 3/8/2015
Permit Evaluation Report (PER) Annual Date: Apr 1 - Mar 31, Due May 15

This document constitutes issuance to:

PLASTI-KOTE CO., INC.
1000 LAKE ROAD
P.O. BOX 708
Medina, OH 44256-3598

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

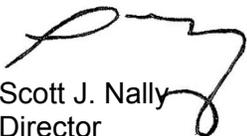
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

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



Authorization (continued)

Permit Number: P0114990
 Permit Description: Administrative modification of Permit to Install and Operate P0105566 issued final on March 8, 2010 to change the emission factor for calculating the emissions from the gas house of emissions units P002, P003 and P004 based on results of stack test conducted on April 18, 2013 and to modify the terms and conditions of the record keeping for emissions unit R007 in the Facility-Wide Terms and Conditions.

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

Emissions Unit ID: P021
 Company Equipment ID: Degassing Booth
 Superseded Permit Number: P0105566
 General Permit Category and Type: Not Applicable

Emissions Unit ID: P060
 Company Equipment ID: Ball Mill
 Superseded Permit Number: P0105566
 General Permit Category and Type: Not Applicable

Group Name: Filling Lines

Emissions Unit ID:	P002
Company Equipment ID:	Filling Line #1
Superseded Permit Number:	P0105566
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P003
Company Equipment ID:	Filling Line #2
Superseded Permit Number:	P0105566
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P004
Company Equipment ID:	Filling Line #3
Superseded Permit Number:	P0105566
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P005
Company Equipment ID:	Filling Line #4
Superseded Permit Number:	P0105566
General Permit Category and Type:	Not Applicable

Group Name: Paint Mixing Stations

Emissions Unit ID:	P022
Company Equipment ID:	Paint Mixing Station #5
Superseded Permit Number:	P0105566
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P023
Company Equipment ID:	Paint Mixing Station #6
Superseded Permit Number:	P0105566
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P024
Company Equipment ID:	Paint Mixing Station #8
Superseded Permit Number:	P0105566
General Permit Category and Type:	Not Applicable



Final Permit-to-Install and Operate
PLASTI-KOTE CO., INC.
Permit Number: P0114990
Facility ID: 1652050060
Effective Date: 7/19/2013

Group Name: Sand Mills

Emissions Unit ID:	P061
Company Equipment ID:	Sand Mill #1
Superseded Permit Number:	P0105566
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P062
Company Equipment ID:	Sand Mill #2
Superseded Permit Number:	P0105566
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P063
Company Equipment ID:	Sand Mill #3
Superseded Permit Number:	P0105566
General Permit Category andType:	Not Applicable



Final Permit-to-Install and Operate
PLASTI-KOTE CO., INC.
Permit Number: P0114990
Facility ID: 1652050060
Effective Date: 7/19/2013

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 submitting¹ a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

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

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

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



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

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

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

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

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

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



Final Permit-to-Install and Operate
PLASTI-KOTE CO., INC.
Permit Number: P0114990
Facility ID: 1652050060
Effective Date: 7/19/2013

B. Facility-Wide Terms and Conditions



1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) 2, 3.a), 3.b), 3.c), 3.d), 3.e), 3.f), 4 and 5.

2. Plasti-Kote Co., Inc. has requested to restrict the emissions of any individual hazardous air pollutant (HAP) to 9.5 tons per rolling, 12-month period, the emissions of total combined hazardous air pollutants (HAPs) to 24.5 tons per rolling, 12-month period and the emissions of volatile organic compounds (VOC) to 99.5 tons per rolling, 12-month period for the entire facility. The permittee proposed these emission limitations to avoid being classified as a major source for Title V and to avoid being classified as a major source as defined in section 63.2 of 40 CFR Part 63 for any upcoming and promulgated Maximum Achievable Control Technology (MACT) standards (i.e., Miscellaneous Organic Chemical Production and Processes, 40 CFR Part 63, Subpart FFFF, Plastic Parts (surface coating), 40 CFR Part 63, Subpart PPPP, and Miscellaneous Coating Manufacturing, 40 CFR Part 63, Subpart HHHHH).

Plasti-Kote Co., Inc. has accepted these emission limitations as facility-wide caps on emissions from the following emissions units, combined: B002, B003, B004, P002, P003, P004, P005, P007, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P029, P030, P047, P048, P049, P050, P051, P052, P053, P054, P055, P056, P057, P058, P059, P060, P061, P062, P063, P064, P065, R007, T001, T002, T003, T004, T005, T006, T007, T008, T009, T010, T011, T012, T013, T022, T023, T024, T025, T035, T036, T037, T038, T039, T040, T041, T042, T043, T044, T045, T046, T047, T048, T049, T050, T051, T052, T053, T054, T055, T056, T057, T058, T059, T060, T062 and T063.

3. In order to determine compliance with the facility-wide emission limitations, the permittee shall maintain monthly records of the following information for emissions units B002, B003, B004, P002, P003, P004, P005, P007, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P029, P030, P047, P048, P049, P050, P051, P052, P053, P054, P055, P056, P057, P058, P059, P060, P061, P062, P063, P064, P065, R007, T001, T002, T003, T004, T005, T006, T007, T008, T009, T010, T011, T012, T013, T022, T023, T024, T025, T035, T036, T037, T038, T039, T040, T041, T042, T043, T044, T045, T046, T047, T048, T049, T050, T051, T052, T053, T054, T055, T056, T057, T058, T059, T060, T062 and T063:
 - a) The permittee shall maintain the following monthly records for emissions unit R007:
 - (1) the name and identification number of each coating, as applied;
 - (2) the VOC content of each coating employed or the “worst-case” VOC content of all the coatings employed for each coating type, in pound(s) of VOC per gallon of coating, as applied;



- (3) the individual HAP* content for each HAP of each coating employed or the “worst-case” individual HAP content for each HAP from all coating employed for each coating type, in pound(s) of each HAP per gallon of coating, as applied;
- (4) the total combined HAPs content of each coating employed or the “worst-case” total combined HAPs content of all coatings employed for each coating type, in pound(s) of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from a)(3) above);
- (5) the number of gallons of each coating employed or if using the “worst-case” coating the total number of gallons of all coatings employed for each coating type;
- (6) the name and identification of each cleanup material employed;
- (7) the VOC content of each cleanup material, in pound(s) of VOC per gallon of cleanup material, as applied;
- (8) the individual HAP content for each HAP of each cleanup material, in pound(s) of each HAP per gallon of cleanup material, as applied;
- (9) the total combined HAPs content of each cleanup material, in pound(s) of total combined HAPs per gallon of cleanup material, as applied (sum all the individual HAP contents from a)(8) above);
- (10) the number of gallons of each cleanup material employed;
- (11) the VOC emissions from emissions unit R007, in ton(s) per month;
- (12) the individual HAP emissions for each HAP from emissions unit R007, in ton(s) per month; and
- (13) the total combined HAPs emissions from emissions unit R007, in ton(s) per month.

* A listing of the HAPs can be found in section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on a line-by-line basis.

Note: At a minimum, the permittee shall verify annually that the “worst-case” coating contents for each coating type employed in the spreadsheet calculations are at or above the actual coating contents that were employed in emissions unit R007. The permittee shall maintain documentation of the annual verification.

- b) The permittee shall maintain the following monthly records for emissions units P002, P003, P004 and P005:
 - (1) the total number of aerosol paint cans filled using emissions units P002, P003 and P004;
 - (2) the total number of aerosol paint cans filled using emissions unit P005; and



- (3) the VOC emission rate from gassing, in ton(s) per month (i.e., b)(1) times 0.0033 pounds of VOC per can* plus b)(2) times 0.002168 pounds of VOC per can**, then divide by 2000 pounds per ton).

*Emission factor is based on results of the stack testing conducted on April 18, 2013.

**Emission factor is based on manufacturing and/or stack testing data supplied by the permittee in the correspondence dated April 25, 2001.

Note: The VOC, individual HAP and total combined HAPs emissions from the mixing prior to filling the cans with paint and the filling of paint into the cans for emissions unit P002, P003, P004 and P005 are determined in c) below.

- c) The permittee shall maintain the following monthly records for emissions units P007, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P022, P023, P024, P029, P030, P047, P048, P049, P050, P051, P052, P053, P054, P055, P056, P057, P060, P061, P062, P063, the mixing prior to filling the aerosol paint cans for emissions units P002, P003, P004 and P005 and the filling of paint into the cans for emissions units P002, P003, P004 and P005, combined:

- (1) the total throughput of each paint category, in gallons per month;
- (2) the VOC emission rate, in ton(s) per month (i.e., using worst-case derived combined emission factor for each paint category as calculated using EIIIP Preferred and Alternative Methods for Estimating Air Emissions Volume II, Chapter 8, Section 4, equations 8.4-1, 8.4-10, and 8.4-22);
- (3) the individual HAP emission rate for each HAP, in ton(s) per month (i.e., using worst-case derived combined emission factor for each paint category as calculated using EIIIP Preferred and Alternative Methods for Estimating Air Emissions Volume II, Chapter 8, Section 4, equations 8.4-1, 8.4-10, and 8.4-22)); and
- (4) the total combined HAPs emission rate, in ton(s) per month (i.e., the sum of the individual HAP emission rates from c)(3) above).

- d) The permittee shall maintain the following monthly records for emissions unit P021:

- (1) the number of cans degassed per month; and
- (2) the VOC emission rate, in ton(s) per month (i.e., d)(1) times 0.192 pound of VOC per can degassed*, then divide by 2000 pounds per ton).

*Emission factor supplied by the permittee in correspondence dated September 15, 2000.

- e) The permittee shall maintain the following monthly records for emissions unit P025:

- (1) the number of tanks cleaned;
- (2) the VOC from all cleanup materials employed, in ton(s) per month (i.e., the permittee may use the spreadsheet titled Tank Washing to determined the emissions);



- (3) the individual HAP* emissions for each HAP from all cleanup materials employed, in ton(s) per month (i.e., the permittee may use the spreadsheet titled Tank Washing to determined the emissions); and
- (4) the total combined HAPs emissions from all cleanup materials employed, in ton(s) per month (i.e., the permittee may use the spreadsheet titled Tank Washing to determined the emissions).

* A listing of the HAPs can be found in section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on a line-by-line basis.

- f) The permittee shall maintain the following monthly records for the entire facility:
 - (1) the VOC emission rate for the entire facility, in ton(s) per month (i.e., a)(11) plus b)(3) plus c)(2) plus d)(2) plus e)(2) plus (X*/12);
 - (2) the individual HAP emission rate for each HAP for the entire facility, in ton(s) per month (i.e., a)(12) plus c)(3) plus e)(3) plus (Y**/12));
 - (3) the total combined HAPs emission rate for the entire facility, in ton(s) per month (i.e., a)(13) plus c)(4) plus e)(4) plus (Z***/12) or the summation of the individual HAP emissions rates from f)(2) above); and
 - (4) the rolling, 12-month summation of the monthly emissions of each individual HAP, total combined HAPs and VOC for the entire facility for each calendar month.

*The annual potential to emit for VOC for the emissions units exempt under OAC rule 3745-31-03 and OAC rule 3745-15-05 "De Minimis" air contaminant source exemption.

**The annual potential to emit for each individual HAP for the emissions units exempt under OAC rule 3745-31-03 and OAC rule 3745-15-05 "De Minimis" air contaminant source exemption.

***The annual potential to emit for combined HAPs for the emissions units exempt under OAC rule 3745-31-03 and OAC rule 3745-15-05 "De Minimis" air contaminant source exemption.

- 4. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - 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:
 - (1) 9.5 tons of any individual HAP per rolling, 12-month period for the entire facility;
 - (2) 24.5 tons of total combined HAPs per rolling, 12-month period for the entire facility; and
 - (3) 99.5 tons of VOC per rolling, 12-month period for the entire facility.



- 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).

5. Compliance with the emission limitations in 2 above shall be determined in accordance with the following methods:

- a) Emission Limitations:

9.5 tons of any individual HAP per rolling, 12-month period

24.5 tons of total combined HAPs per rolling, 12-month period

99.5 tons of VOC per rolling, 12-month period

Applicable Compliance Method:

Compliance with the annual allowable VOC, individual HAP, and total combined HAPs emission limitations above shall be demonstrated based on the record keeping requirements established in 3.a) through 3.f) above.



Final Permit-to-Install and Operate
PLASTI-KOTE CO., INC.
Permit Number: P0114990
Facility ID: 1652050060
Effective Date: 7/19/2013

C. Emissions Unit Terms and Conditions



1. P021, Degassing Booth

Operations, Property and/or Equipment Description:

Removal of propellant gas (propane) from scrap product paint spray cans - Degassing Booth

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. b)(1)a.

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) (Synthetic Minor to avoid Title V and MACT applicability under 40 CFR Part 63, Subpart FFFF, Subpart PPPP, and Subpart HHHHH)	See 2, 3.a) through 3.f), 4 and 5 of Section B. Facility-Wide Terms and Conditions.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) For monitoring and/or recordkeeping requirements, see 3 in Section B. Facility-Wide Terms and Conditions.



e) Reporting Requirements

- (1) 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 e-Business Center: Air Services by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (2) For additional reporting requirements, see 4 in Section B. Facility-Wide Terms and Conditions.

f) Testing Requirements

- (1) None.

g) Miscellaneous Requirements

- (1) None.



2. P060, Ball Mill

Operations, Property and/or Equipment Description:

Equipment for grinding pigments, resins, and solvents to make paint pastes - Ball Mill

- 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. b)(1)e.
- 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 3745-17-07(A)	Visible particulate emissions (PE) from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
b.	OAC rule 3745-17-07(B)	Visible PE of fugitive dust from this emissions unit shall not exceed twenty percent opacity as a three-minute average.
c.	OAC rule 3745-17-08(B)	See b)(2)a. below.
d.	OAC rule 3745-17-11	The PE from this emissions unit shall not exceed 3.53 pounds per hour.
e.	OAC rule 3745-31-05(D) (Synthetic Minor to avoid Title V and MACT applicability under 40 CFR Part 63, Subpart FFFF, Subpart PPPP, and Subpart HHHH)	See 2, 3.a) through 3.f), 4 and 5 of Section B. Facility-Wide Terms and Conditions.



(2) Additional Terms and Conditions

- a. The installation and use of hoods, fans and other equipment to adequately enclose, contain, capture, vent and control the fugitive dust. The collection efficiency shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.
- b. The emissions from this emissions unit shall be vented to the baghouse at all times the emissions unit is in operation and using powder raw materials (particulate emission producing).

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the baghouse is between 0.1 to 5.0 inches of water.
- (2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit is in operation and using powder raw materials (particulate emission producing), including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a daily basis. The monitoring equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that



determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the pressure drop readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit. In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

- (3) For additional monitoring and/or recordkeeping requirements, see 3 in Section B. Facility-Wide Terms and Conditions.

e) Reporting Requirements

- (1) The permittee shall identify in the annual permit evaluation report (PER) the following information concerning the operations of the baghouse during the 12-month reporting period for this emissions unit:
 - a. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the acceptable range;
 - b. any period of time (start time and date, and end time and date) when the emissions unit was in operation and using powder raw materials (particulate emission producing) and the process emissions were not vented to the baghouse;
 - c. each incident of deviation described in "a" (above) where a prompt investigation was not conducted;



- d. each incident of deviation described in "a" where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - e. each incident of deviation described in "a" where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.
- (2) The permittee shall submit an annual PER to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA e-Business Center: Air Services by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (3) For additional reporting requirements, see 4 in Section B. Facility-Wide Terms and Conditions.
- 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:**

Visible PE from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9.
 - b. **Emission Limitation:**

Visible PE of fugitive dust from this emissions unit shall not exceed twenty percent opacity as a three-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance U.S. EPA Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).
 - c. **Emission Limitation:**

The PE from this emissions unit shall not exceed 3.53 pounds per hour

Applicable Compliance Method:



Final Permit-to-Install and Operate

PLASTI-KOTE CO., INC.

Permit Number: P0114990

Facility ID: 1652050060

Effective Date: 7/19/2013

Compliance with the hourly allowable PE limitation above shall be demonstrated by multiplying the PE factor of 20 pounds of PE per ton of dry pigment* by the maximum hourly amount of dry pigment (ton(s) per hour) times (1-0.9**).

If required, compliance with the hourly allowable PE limitations above shall be determined by using the test method(s) and procedures in U.S. EPA Methods 1 through 5 of 40 CFR Part 60, Appendix A.

*Emission factor is from AP-42 Table 6.4-1 dated 5/83.

**Overall control efficiency of the baghouse.

g) Miscellaneous Requirements

(1) None.



3. Emissions Unit Group -Filling Lines: P002,P003,P004,P005,

EU ID	Operations, Property and/or Equipment Description
P002	Aerosol Gassing Equipment - Kartridge Pak 9 - Head under-cap gasser/crimper - Filling Line #1
P003	Aerosol Gassing Equipment - Kartridge Pak 9 - Head under-cap gasser/crimper - Filling Line #2
P004	Aerosol Gassing Equipment - Kartridge Pak 6 - Head under-cap gasser/crimper - Filling Line #3
P005	Aerosol Gassing Equipment - Terco index filler - Filling Line #4

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. b)(1)a.

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) (Synthetic Minor to avoid Title V and MACT applicability under 40 CFR Part 63, Subpart FFFF, Subpart PPPP, and Subpart HHHHH)	See 2, 3.a) through 3.f), 4 and 5 of Section B. Facility-Wide Terms and Conditions.

(2) Additional Terms and Conditions

a. None.



- c) Operational Restrictions
 - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) For monitoring and/or recordkeeping requirements, see 3 in Section B. Facility-Wide Terms and Conditions.
- e) Reporting Requirements
 - (1) 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 e-Business Center: Air Services by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
 - (2) For additional reporting requirements, see 4 in Section B. Facility-Wide Terms and Conditions.
- f) Testing Requirements
 - (1) None.
- g) Miscellaneous Requirements
 - (1) None.



4. Emissions Unit Group -Paint Mixing Stations: P022,P023,P024,

EU ID	Operations, Property and/or Equipment Description
P022	Paint making equipment comprising of high speed disperser, 250 gal. capacity or less mixing vessel, measuring scale, and raw material metering system - Paint Mixing Station #5
P023	Paint making equipment comprising of high speed disperser, 250 gal. capacity or less mixing vessel, measuring scale, and raw material metering system - Paint Mixing Station #6
P024	Paint making equipment comprising of high speed disperser, 250 gal. capacity or less mixing vessel, measuring scale, and raw material metering system - Paint Mixing Station #8

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. b)(1)e.

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 3745-17-07(A)	For emissions unit P022, P023 and P024: Visible particulate emissions (PE) from the stack serving each emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
b.	OAC rule 3745-17-07(B)	For emissions unit P022, P023 and P024: Visible PE of fugitive dust shall not exceed twenty percent opacity as a three-minute average.
c.	OAC rule 3745-17-08(B)	See b)(2)a. below.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-17-11	For emissions unit P022, P023 and P024: The PE from each emissions unit shall not exceed 3.80 pounds per hour.
e.	OAC rule 3745-31-05(D) (Synthetic Minor to avoid Title V and MACT applicability under 40 CFR Part 63, Subpart FFFF, Subpart PPPP, and Subpart HHHHH)	See 2, 3.a) through 3.f), 4 and 5 of Section B. Facility-Wide Terms and Conditions.

(2) Additional Terms and Conditions

- a. The installation and use of hoods, fans, and other equipment to adequately enclose, contain, capture, vent and control the fugitive dust. The collection efficiency shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.
- b. The emissions from the emissions units listed above shall be vented to a baghouse when one or more of the emissions units are in operation and using powder raw materials (particulate emission producing).

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across each baghouse is between 0.1 to 5.0 inches of water.
- (2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across each baghouse when the controlled emissions unit(s) is/are in operation and using powder raw materials (particulate emission producing), including periods of startup and shutdown. The permittee shall record the pressure drop across each baghouse on a daily basis. The monitoring equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:



- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the pressure drop readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

This range or limit on the pressure drop across each baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

- (3) For additional monitoring and/or recordkeeping requirements, see 3 in Section B. Facility-Wide Terms and Conditions.



e) Reporting Requirements

- (1) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of each baghouse during the 12-month reporting period for this/these emissions unit(s):
 - a. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the acceptable range;
 - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and using powder raw materials (particulate emission producing) and the process emissions were not vented to the baghouse;
 - c. each incident of deviation described in "a" (above) where a prompt investigation was not conducted;
 - d. each incident of deviation described in "a" where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - e. each incident of deviation described in "a" where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.
- (2) The permittee shall submit an annual PER to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA e-Business Center: Air Services by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (3) For additional reporting requirements, see 4 in Section B. Facility-Wide Terms and Conditions.

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:

For emissions unit P022, P023 and P024: Visible PE from the stack serving each emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9.



b. Emission Limitation:

For emissions unit P022, P023 and P024: Visible PE of fugitive dust shall not exceed twenty percent opacity as a three-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance U.S. EPA Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

c. Emission Limitation:

For emissions unit P022, P023 and P024: The PE from each emissions unit shall not exceed 3.80 pounds per hour.

Applicable Compliance Method:

Compliance with the hourly allowable PE limitation above shall be demonstrated by multiplying the PE factor of 20 pounds of PE per ton of dry pigment * by the maximum hourly amount of dry pigment (ton(s) per hour) times (1-0.9**).

If required, compliance with the hourly allowable PE limitations above shall be determined by using the test method(s) and procedures in U.S. EPA Methods 1 through 5 of 40 CFR Part 60, Appendix A.

*Emission factor is from AP-42 Table 6.4-1 dated 5/83.

**Overall control efficiency of the baghouse.

g) Miscellaneous Requirements

(1) None.



5. Emissions Unit Group -Sand Mills: P061,P062,P063,

EU ID	Operations, Property and/or Equipment Description
P061	Equipment using sand as a grinding media to achieve proper paint paste blend - Sand Mill #1
P062	Equipment using sand as a grinding media to achieve proper paint paste blend - Sand Mill #2
P063	Equipment using sand as a grinding media to achieve proper paint paste blend - Sand Mill #3

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. b)(1)a.

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) (Synthetic Minor to avoid Title V and MACT applicability under 40 CFR Part 63, Subpart FFFF, Subpart PPPP, and Subpart HHHHH)	See 2, 3.a) through 3.f), 4 and 5 of Section B. Facility-Wide Terms and Conditions.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) None.



- d) Monitoring and/or Recordkeeping Requirements
 - (1) For monitoring and recordkeeping requirements, see 3 in Section B. Facility-Wide Terms and Conditions.
- e) Reporting Requirements
 - (1) 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 e-Business Center: Air Services by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
 - (2) For additional reporting requirements, see 4 in Section B. Facility-Wide Terms and Conditions.
- f) Testing Requirements
 - (1) None.
- g) Miscellaneous Requirements
 - (1) None.