



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center  
122 S. Front Street  
Columbus, OH 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address

Lazarus Gov. Center  
P.O. Box 1049  
Columbus, OH 43216-1049

03/11/04

**CERTIFIED MAIL**

**RE: Final Chapter 3745-35 Permit To Operate**

**P001 (D001) 100 HP Hockmeyer**

**Aexcel Corporation (02-43-08-1231)**  
**Lorie Webb**  
**7373 Production Drive**  
**Mentor, OH 44060**

Dear Lorie Webb

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action of the Director is final 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. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, Ohio 43215

If you have any questions, please contact Northeast District Office.

Sincerely,

Michael W. Ahern  
Permit Issuance and Data Management Section  
Division of Air Pollution Control

Northeast District Office



State of Ohio Environmental Protection Agency

## Final Permit To Operate An Emissions Unit

Effective Date: 03/11/04

Expiration Date: 03/11/09

This document constitutes issuance to:

Facility ID: 02-43-08-1231  
Aexcel Corporation  
7373 Production Drive  
Mentor, OH 44060

of a permit to operate for:

P001 (D001)  
100 HP Hockmeyer

You will be contacted six months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency identified below. This permit and the authorization to operate the air contaminant source (emissions unit) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC Chapter 3745-35 and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your permit:

Northeast District Office  
2110 East Aurora Road  
Twinsburg, OH 44087  
(330) 425-9171

This permit is granted subject to the conditions attached hereto.

OHIO ENVIRONMENTAL PROTECTION AGENCY

A handwritten signature in black ink, appearing to read "Christopher Jones", written over a horizontal line.

Christopher Jones  
Director

## Part I: General Terms and Conditions

### 1 Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

### 2 Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

### 3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

### 4. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Such records may be maintained in computerized form.

### 5. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State and federal air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an

authorized representative of the Director, copies of records required to be kept by this permit.

**6. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions unit or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of this emissions unit(s) that is (are) served by such control system(s).

**7. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permittee. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

**8. Air Pollution Nuisance**

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

**9. Permit Renewal**

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the following Ohio EPA District Office or local air agency which has jurisdiction in the area in which the facility is located:

Northeast District Office  
2110 East Aurora Road  
Twinsburg, OH 44087  
(330) 425-9171

It is the permittee's responsibility to renew this permit even if no notice of its expiration is received

**Part II: Special Terms and Conditions**

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Traffic Paint Dispenser System #1 consisting of a disperser, letdown tanks, and filling stations.	OAC rule 3745-17-07	Except as provided by rule, the permittee shall not cause or allow the discharge of visible particulate emissions into the ambient air from any stack associated with this emissions unit greater than twenty percent (20%) opacity, as a six-minute average. Visible particulate emissions may exceed 20% opacity as a six-minute average, for not more than six consecutive minutes in any sixty minutes, but shall not exceed sixty percent (60%) opacity, as a six-minute average, at any time.
	OAC rule 3745-17-11	The particulate emission limit based upon this applicable rule is less stringent than the limit established pursuant to OAC rule 3745-31-05.
	OAC rule 3745-21-07 (G)(2)	The OC limit based upon this applicable rule is less stringent than the limit established pursuant to OAC rule 3745-35-07.
	OAC rule 3745-31-05 PTI No. 02-4672	See section A.2.d of these terms and conditions.
		The permittee shall not exceed the following limits:
		a. 0.1 pound per hour and 0.44 ton per year of particulates; and
		b. 0.01 pound per hour and 0.044 ton per year of lead.
	OAC rule 3745-35-07	The VOC limits specified in the PTI are less stringent than the OC limits established pursuant to OAC rule 3745-35-07.
		See section A.2.a - A.2.d of these terms and conditions.

**2. Additional Terms and Conditions**

- 2.a The methanol emission from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 shall not exceed 6.01 tons per year, based upon rolling 52-week summations of the weekly emissions.

**2. Additional Terms and Conditions (continued)**

- 2.b** The emissions of each single hazardous air pollutant (HAP), excluding methanol, from emissions units P001, P002, P004, P005, P006, P007, P008, P009 and P010 shall not exceed 9.03 tons per year, based upon rolling 52-week summations of the weekly emissions.
- 2.c** The emissions of the combined HAPs from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 shall not exceed 19.14 tons per year, based upon rolling 52-week summations of the weekly emissions.
- 2.d** The organic compound emissions from this emissions unit shall not exceed 8 pounds per hour and 40 pounds per day. These limits apply to every day of operation, including any day when photochemically reactive materials are not employed in this emissions unit.

**B. Operational Restrictions**

- 1. The pressure drop across the baghouse shall be maintained within the range of 2 to 5 inches of water while the emissions unit is in operation.

**C. Monitoring and/or Record Keeping Requirements**

- 1. To ensure compliance with the OC emission limits in section A.2.d of these terms and conditions, the permittee shall keep the following weekly records:
  - a** Name or ID of each solvent, including cleanup solvents, used in this emissions unit
  - b** Amount of each solvent used, "DS", in pounds per week.
  - c** The total amount of solvent usage, "TDS", in pounds per week. "TDS" is equal to the summation, from  $i = 1$  to  $i = n$ , of  $(DS)_i$ , where:  
 $i$  = subscript denoting a solvent, and  
 $n$  = the number of different solvents.
  - d** The total operating days, "OTD", in days per week
  - e** The total operating hours, "OT", in hours per week.
  - f** The amount of OC emitted from the disperser, in pounds per week, to be defined as "DDV". "DDV" shall be calculated as follows:  
 $DDV = TDS * EF$ ,  
where, EF = emission factor, pounds OC per pound of solvents used, which shall be based upon the most recent stack test. The current EF is 0.000021 pound OC per pound of solvents used, which was determined by the most recent stack test, conducted on February 16, 1996.
  - g** The amount of OC emitted from the letdown tanks, in pounds per week, to be defined as "DTV". "DTV" shall be calculated based upon AP - 42, 1995, Chapter 7, Liquid Storage Tanks, equation 1 - 23, working loss from fixed roof tanks, by using the total amount of solvent usage recorded in section C.1.c of these terms and conditions.
  - h** The amount of OC emitted from the filling stations, in pounds per week, to be defined as "DLV". "DLV" shall be calculated based upon AP - 42, 1995, Chapter 5.2, Transportation and Marketing of Petroleum Liquids, equation 1, emissions from loading petroleum liquids, by using the total amount of solvent usage recorded in section C.1.c of these terms and conditions.
  - i** The weekly OC emissions from this emissions unit, in pounds per week, to be defined as "WV". "WV" shall be calculated as follows:  
 $WV = DDV + DTV + DLV$

**C. Monitoring and/or Record Keeping Requirements (continued)**

j. The average daily OC emissions from this emissions unit, in pounds per day, to be defined as "DV". "DV" shall be calculated as follows:  
 $DV = WV / OTD$

k. The average hourly OC emissions rate, in pounds per hour, to be defined as "HV". "HV" shall be calculated as follows:  
 $HV = WV / OT$

2. To ensure compliance with the HAP limits, the permittee shall keep the following weekly records:

a. Name or ID for each HAP employed in this emissions unit.

b. The amount of each single HAP employed, "MH", in pounds per week

c. The amount of each single HAP emitted from this emissions unit, in pounds per week, to be defined as "SHAP". "SHAP" shall be calculated as follows:  
 $SHAP = (MH / TDS) * WV$   
where, "WV" and "TDS" are as defined in section C.1 of these terms and conditions.

d. The total amount of combined HAPs emitted from this emissions unit, in pounds per week, to be defined as "THAP". "THAP" equals the summation, from  $i = 1$  to  $i = n$ , of  $(SHAP)_i$ ,  
where  
 $i$  = subscript denoting a single HAP, and  
 $n$  = the number of different single HAPs.

3. The permittee shall keep the following rolling, 52-week summations, in tons, for this emissions unit and for emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 combined:

a. the emissions of each single HAP; and

b. the emissions of combined HAPs.

4. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on daily basis.

**D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which include the following information:

a. An identification of each week during which the average OC emissions from this emissions unit exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such week.

b. An identification of each week during which the average OC emissions from this emissions unit exceeded 40 pounds per day, and the actual average daily OC emissions for each such week.

c. An identification of each week during which the rolling, 52-week emissions of methanol from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 exceeded 6.01 tons per year, and the actual rolling, 52-week emissions of methanol for each such week.

d. An identification of each week during which the rolling, 52-week emissions of any single HAP, excluding methanol, from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 exceeded 9.03 tons per year, and the actual rolling, 52-week emissions of each such single HAP for each such week.

e. An identification of each week during which the rolling, 52-week emissions of combined HAPs from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 exceeded 19.14 tons per year, and the actual rolling, 52-week emissions of combined HAPs for each such week.

**D. Reporting Requirements (continued)**

2. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in section B.1 of these terms and conditions.
3. All deviation (excursion) reports shall be submitted in accordance with section 3.b of the General Terms and Conditions.
4. The permittee shall submit annual reports that summarize the emissions of OC, each single HAP, and combined HAPs from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010. The reports shall include the emission calculations, shall be submitted by February 15 of each year, and shall cover the previous calendar year.

**E. Testing Requirements**

1. Compliance with the emission limitations in section A.1 of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:  
20% opacity as a 6-minute average

Applicable Compliance Method: Compliance with visible particulate emission limitations shall be determined in accordance with the test method and procedures in OAC Rule 3745-17-03 (B)(1).

b. Emission Limitation:  
0.1 lb/hour of particulates

Applicable Compliance Method: Compliance shall be determined in accordance with the test methods and procedures in OAC rule 3745-17-03 (B)(10)(a), if required by Ohio EPA.

c. Emissions Limitation  
0.01 lb/hour of lead

Applicable Compliance Method: Compliance shall be determined in accordance with test Method 12 of 40 CFR Part 60, Appendix A, if required by Ohio EPA.

d. Emission Limitation:  
0.44 ton/year of particulates  
0.044 ton/year of lead

Applicable Compliance Method: The ton per year limitations were developed by multiplying the pound per hour limitations by the maximum operating schedule of 8760 hours per year. Therefore, provided compliance is shown with the hourly limitations, compliance will also be shown with the annual limitations.

**E. Testing Requirements (continued)**

2. Compliance with the emission limitations in section A.2 of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

6.01 tons of methanol per year from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010, based upon rolling 52-week summations of the weekly emissions.

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section C.3 of these terms and conditions.

b. Emission Limitation:

9.03 tons of each single HAP (excluding methanol) per year from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010, based upon rolling 52-week summations of the weekly emissions.

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section C.3 of these terms and conditions.

c. Emission Limitation:

19.14 tons of combined HAPs per year from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010, based upon rolling 52-week summations of the weekly emissions.

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section C.3 of these terms and conditions.

d. Emissions Limitation

8 lbs/hour of OC

40 lbs/day of OC

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in section C.1 of these terms and conditions.

3. Formulation data shall be used to determine the HAP and organic compound contents of each material used in this emissions unit.
4. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- a. The emission testing shall be conducted within 6 months prior to permit expiration
- b. The emission testing shall be conducted to determine the emission factor, in pound OC per pound of solvent used, for the disperser.
- c. The following test method shall be employed: Method 25A, 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
- d. The test shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

**E. Testing Requirements (continued)**

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

**F. Miscellaneous Requirements**

1. Pursuant to OAC rule 3745-35-07, the following sections of these terms and conditions are federally enforceable: A - F.



State of Ohio Environmental Protection Agency

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Mailing Address:

Lazarus Gov. Center  
P.O. Box 1049  
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03/11/04

**CERTIFIED MAIL**

**RE: Final Chapter 3745-35 Permit To Operate**

**P002 (D002) 100 HP Hockmeyer**

Aexcel Corporation (02-43-08-1231)  
Lorie Webb  
7373 Production Drive  
Mentor, OH 44060

Dear Lorie Webb:

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

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If you have any questions, please contact Northeast District Office.

Sincerely,

Michael W. Ahern  
Permit Issuance and Data Management Section  
Division of Air Pollution Control

cc: Northeast District Office



State of Ohio Environmental Protection Agency

## Final Permit To Operate An Emissions Unit

Effective Date: 03/11/04

Expiration Date: 03/11/09

This document constitutes issuance to:

Facility ID: 02-43-08-1231

Aexcel Corporation  
7373 Production Drive  
Mentor, OH 44060

of a permit to operate for:

P002 (D002)  
100 HP Hockmeyer

You will be contacted six months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency identified below. This permit and the authorization to operate the air contaminant source (emissions unit) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC Chapter 3745-35 and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

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OHIO ENVIRONMENTAL PROTECTION AGENCY

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Christopher Jones  
Director

## **Part I: General Terms and Conditions**

### **1 Compliance Requirements**

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The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State and federal air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this

permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

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Any transferee of this permit shall assume the responsibilities of the prior permittee. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

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**Part II: Special Terms and Conditions**

**A. Applicable Emissions Limitations and/or Control Requirements**

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<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Traffic Paint Dispenser System #2, consisting of a dispenser, letdown tanks, and filling stations.	OAC rule 3745-17-07	Except as provided by rule, the permittee shall not cause or allow the discharge of visible particulate emissions into the ambient air from any stack associated with this emissions unit greater than twenty percent (20%) opacity, as a six-minute average. Visible particulate emissions may exceed 20% opacity as a six-minute average, for not more than six consecutive minutes in any sixty minutes, but shall not exceed sixty percent (60%) opacity, as a six-minute average, at any time.
	OAC rule 3745-17-1	The particulate emission limit based upon this applicable rule is less stringent than the limit established pursuant to OAC rule 3745-31-05.
	OAC rule 3745-21-07 (G)(2)	The OC limit based upon this applicable rule is less stringent than the limit established pursuant to OAC rule 3745-35-07.
	OAC rule 3745-31-05 PTI 02-4672	See section A.2.d of these terms and conditions. The permittee shall not exceed the following limits: a. 0.1 pound per hour and 0.44 ton per year of particulates; and b. 0.01 pound per hour and 0.044 ton per year of lead.
	OAC rule 3745-35-07	The VOC limits specified in the PTI are less stringent than the OC limits established pursuant to OAC rule 3745-35-07. See section A.2.a - A.2.d of these terms and conditions.

**2. Additional Terms and Conditions**

- 2.a** The methanol emission from emissions units P001, P002, P004, P005, P006, P007, P008, P009, P010 shall not exceed 6.01 tons per year, based upon rolling 52-week summations of the weekly emissions.
- 2.b** The emissions of each single hazardous air pollutant (HAP), excluding methanol, from emissions units P001, P002, P004, P005, P006, P007, P008, P009 and P010 shall not exceed 9.03 tons per year, based upon rolling 52-week summations of the weekly emissions.
- 2.c** The emissions of the combined HAPs from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 shall not exceed 19.14 tons per year, based upon rolling 52-week summations of the weekly emissions.
- 2.d** The organic compound emissions from this emissions unit shall not exceed 8 pounds per hour and 40 pounds per day. These limits apply to every day of operation, including any day when photochemically reactive materials are not employed in this emissions unit.

**B. Operational Restrictions**

- 1.** The pressure drop across the baghouse shall be maintained within the range of 2 to 5 inches of water while the emissions unit is in operation.

### C. Monitoring and/or Record Keeping Requirements

1. To ensure compliance with the OC emission limits specified in section A.2.d of these terms and conditions, the permittee shall keep the following weekly records:

a Name or ID of each solvent, including cleanup solvents, used in this emissions unit.

b Amount of each solvent used, "DS", in pounds per week.

c. The total amount of solvent usage, "TDS", in pounds per week. "TDS" equals to the summation, from  $i = 1$  to  $i = n$ , of  $(DS)_i$ , where:

$i$  = subscript denoting a solvent, and

$n$  = the number of different solvents.

d. The total operating days, "OTD", in days per week.

e The total operating hours, "OT" , in hours per week

f. The amount of OC emitted from the disperser, in pounds per week, to be defined as "DDV". "DDV" shall be calculated as follows:

$$DDV = TDS * EF,$$

where, EF = emission factor, pounds OC per pound of solvents used, which shall be based upon the most recent stack test. The current EF is 0.000021 pound OC per pound of solvents used, which was determined by the most recent stack test, conducted on February 16, 1996.

g. The amount of OC emitted from the letdown tanks, in pounds per week, to be defined as "DTV". "DTV" shall be calculated based upon AP - 42, 1995, Chapter 7, Liquid Storage Tanks, equation 1 - 23, working loss from fixed roof tanks, by using the total amount of solvent usage recorded in section C.1.c of these terms and conditions.

h. The amount of OC emitted from the filling stations, in pounds per week, to be defined as "DLV". "DLV" shall be calculated based upon AP - 42, 1995, Chapter 5.2, Transportation and Marketing of Petroleum Liquids, equation 1, emissions from loading petroleum liquids, by using the total amount of solvent usage recorded in section C.1.c of these terms and conditions.

i. The weekly OC emissions from this emissions unit, in pounds per week, to be defined as "WV". "WV" shall be calculated as follows:

$$WV = DDV + DTV + DLV$$

j. The average daily OC emissions from this emissions unit, in pounds per day, to be defined as "DV". "DV" shall be calculated as follows:

$$DV = WV / OTD$$

k. The average hourly OC emissions rate, in pounds per hour, to be defined as "HV". "HV" shall be calculated as follows:

$$HV = WV / OT$$

**C. Monitoring and/or Record Keeping Requirements (continued)**

2. To ensure compliance with the HAP limits, the permittee shall keep the following weekly records
  - a. Name or ID for each HAP employed in this emissions unit.
  - b. The amount of each single HAP employed, "MH", in pounds per week
  - c. The amount of each single HAP emitted from this emissions unit, in pounds per week, to be defined as "SHAP". "SHAP" shall be calculated as follows:  
$$\text{SHAP} = (\text{MH} / \text{TDS}) * \text{WV}$$
where, "WV" and "TDS" are as defined in section C.1 of these terms and conditions
  - d. The total amount of combined HAPs emitted from this emissions unit, in pounds per week, to be defined as "THAP". "THAP" equals the summation, from  $i = 1$  to  $i = n$ , of (SHAP)<sub>i</sub>, where  
 $i$  = subscript denoting a single HAP, and  
 $n$  = the number of different single HAPs.
3. The permittee shall keep the following rolling, 52-week summations, in tons, for this emissions unit and for emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 combined:
  - a. the emissions of each single HAP; and
  - b. the emissions of combined HAPs.
4. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on daily basis.

**D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. An identification of each week during which the average OC emissions from this emissions unit exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such week.
  - b. An identification of each week during which the average OC emissions from this emissions unit exceeded 40 pounds per day, and the actual average daily OC emissions for each such week.
  - c. An identification of each week during which the rolling, 52-week emissions of methanol from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 exceeded 6.01 tons per year, and the actual rolling, 52-week emissions of methanol for each such week.
  - d. An identification of each week during which the rolling, 52-week emissions of any single HAP, excluding methanol, from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 exceeded 9.03 tons per year, and the actual rolling, 52-week emissions of each such single HAP for each such week.
  - e. An identification of each week during which the rolling, 52-week emissions of combined HAPs from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 exceeded 19.14 tons per year, and the actual rolling, 52-week emissions of combined HAPs for each such week.
2. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in section B.1 of these terms and conditions.
3. All deviation (excursion) reports shall be submitted in accordance with section 3.b of the General Terms and Conditions.
4. The permittee shall submit annual reports that summarize the emissions of OC, each single HAP, and combined HAPs from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010. The reports shall include the emission calculations, shall be submitted by February 15 of each year, and shall cover the previous calendar year.

## **E. Testing Requirements**

1. Compliance with the emission limitations in section A.1 of these terms and conditions shall be determined in accordance with the following methods:

- a. **Emission Limitation:**  
20% opacity as a 6-minute average

**Applicable Compliance Method:** Compliance with visible particulate emission limitations shall be determined in accordance with the test method and procedures in OAC Rule 3745-17-03 (B)(1).

- b. **Emission Limitation:**  
0.1 lb/hour of particulates

**Applicable Compliance Method:** Compliance shall be determined in accordance with the test methods and procedures in OAC rule 3745-17-03 (B)(10)(a), if required by Ohio EPA.

- c. **Emissions Limitation:**  
0.01 lb/hour of lead

**Applicable Compliance Method:** Compliance shall be determined in accordance with test Method 12 of 40 CFR Part 60, Appendix A, if required by Ohio EPA.

- d. **Emission Limitation:**  
0.44 ton/year of particulates  
0.044 ton/year of lead

**Applicable Compliance Method:** The ton per year limitations were developed by multiplying the pound per hour limitations by the maximum operating schedule of 8760 hours per year. Therefore, provided compliance is shown with the hourly limitations, compliance will also be shown with the annual limitations.

2. Compliance with the emission limitations in section A.2 of these terms and conditions shall be determined in accordance with the following methods:

- a. **Emission Limitation:**  
6.01 tons of methanol per year from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010, based upon rolling 52-week summations of the weekly emissions.

**Applicable Compliance Method:** Compliance shall be determined based upon the record keeping specified in section C.3 of these terms and conditions.

- b. **Emission Limitation:**  
9.03 tons of each single HAP (excluding methanol) per year from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010, based upon rolling 52-week summations of the weekly emissions.

**Applicable Compliance Method:** Compliance shall be determined based upon the record keeping specified in section C.3 of these terms and conditions.

- c. **Emission Limitation:**  
19.14 tons of combined HAPs per year from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010, based upon rolling 52-week summations of the weekly emissions.

**Applicable Compliance Method:** Compliance shall be determined based upon the record keeping specified in section C.3 of these terms and conditions.

- d. **Emissions Limitation:**  
8 lbs/hour of OC  
40 lbs/day of OC

**Applicable Compliance Method:** Compliance shall be based upon the record keeping specified in section C.1 of these terms and conditions.

**E. Testing Requirements (continued)**

3. Formulation data shall be used to determine the HAP and organic compound contents of each material used in this emissions unit.
4. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The emission testing shall be conducted within 6 months prior to permit expiration.
  - b. The emission testing shall be conducted to determine the emission factor, in pound OC per pound of solvent used, for the disperser.
  - c. The following test method shall be employed: Method 25A, 40 CFR Part 60, Appendix A . Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
  - d. The test shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

**F Miscellaneous Requirements**

1. Pursuant to OAC rule 3745-35-07, the following sections of these terms and conditions are federally enforceable: A - F.



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center  
122 S. Front Street  
Columbus, OH 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center  
P.O. Box 1049  
Columbus, OH 43218-1049

03/11/04

**CERTIFIED MAIL**

**RE: Final Chapter 3745-35 Permit To Operate**

**P004 (D004) 50 HP Hockmeyer**

Aexcel Corporation (02-43-08-1231)  
Lorie Webb  
7373 Production Drive  
Mentor, OH 44060

Dear Lorie Webb:

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action of the Director is final 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. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, Ohio 43215

If you have any questions, please contact Northeast District Office.

Sincerely,

Michael W. Ahern  
Permit Issuance and Data Management Section  
Division of Air Pollution Control

cc: Northeast District Office



State of Ohio Environmental Protection Agency

## Final Permit To Operate An Emissions Unit

Effective Date: 03/11/04

Expiration Date: 03/11/09

This document constitutes issuance to

Facility ID: 02-43-08-1231  
Aexcel Corporation  
7373 Production Drive  
Mentor, OH 44060

of a permit to operate for:

P004 (D004)  
50 HP Hockmeyer

You will be contacted six months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency identified below. This permit and the authorization to operate the air contaminant source (emissions unit) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC Chapter 3745-35 and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your permit:

Northeast District Office  
2110 East Aurora Road  
Twinsburg, OH 44087  
(330) 425-9171

This permit is granted subject to the conditions attached hereto

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones  
Director

## **Part I: General Terms and Conditions**

### **1. Compliance Requirements**

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

### **2. Permit to Install Requirement**

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

### **3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements**

The permittee shall submit required reports in the following manner:

- a Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

### **4. Records Retention Requirements**

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Such records may be maintained in computerized form.

### **5. Inspections and Information Requests**

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State and federal air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this

permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

**6. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions unit or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of this emissions unit(s) that is (are) served by such control system(s).

**7. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permittee. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

**8. Air Pollution Nuisance**

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

**9. Permit Renewal**

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the following Ohio EPA District Office or local air agency which has jurisdiction in the area in which the facility is located:

Northeast District Office  
2110 East Aurora Road  
Twinsburg, OH 44087  
(330) 425-9171

It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

## Part II: Special Terms and Conditions

### A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Industrial Paint Dispenser System #4, consisting of a disperser, letdown tanks, and filling stations.	OAC rule 3745-17-07	Except as provided by rule, the permittee shall not cause or allow the discharge of visible particulate emissions into the ambient air from any stack associated with this emissions unit greater than twenty percent (20%) opacity, as a six-minute average. Visible particulate emissions may exceed 20% opacity as a six-minute average, for not more than six consecutive minutes in any sixty minutes, but shall not exceed sixty percent (60%) opacity, as a six-minute average, at any time.
	OAC rule 3745-17-11	The particulate emission limit based upon this applicable rule is less stringent than the limit established pursuant to OAC rule 3745-31-05.
	OAC rule 3745-21-07 (G)(2)	The hourly organic compounds (OC) limit based upon this applicable rule is less stringent than the limit established pursuant to OAC rule 3745-31-05.
	OAC rule 3745-31-05 PTI No. 02-4672	The daily OC limit based upon this applicable rule is less stringent than the limit established pursuant to OAC rule 3745-35-07. See section A.2.d of these terms and conditions. The permittee shall not exceed the following limits: a. 7.2 pounds per hour and 7.2 tons per year of VOC; and b. 0.1 pound per hour and 0.44 ton per year of particulates.
	OAC rule 3745-35-07	See section A.2.a and A.2.d of these terms and conditions.

## 2. Additional Terms and Conditions

- 2.a The methanol emission from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 shall not exceed 6.01 tons per year, based upon rolling 52-week summations of the weekly emissions.
- 2.b The emissions of each single hazardous air pollutant (HAP) from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 shall not exceed 9.03 tons per year, based upon rolling 52-week summations of the weekly emissions.
- 2.c The emissions of the combined HAPs from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 shall not exceed 19.14 tons per year, based upon rolling 52-week summations of the weekly emissions.
- 2.d The organic compound emissions from this emissions unit shall not exceed 40 pounds per day. This limit applies to every day of operation, including any day when photochemically reactive materials are not employed in this emissions unit.

## B. Operational Restrictions

- 1. The pressure drop across the baghouse shall be maintained within the range of 2 to 5 inches of water while the emissions unit is in operation.

## C. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall keep the following information each year to determine an emission factor for this emissions unit :
  - a. The annual solvent usage, in tons per year, to be defined as "SU". "SU" shall include initial solvent loaded, adds in of off-spec product, and solvent used to wash down vessels.
  - b. The solvent in production, in tons per year, to be defined as "SP". "SP" shall be calculated as follows:  
$$SP = PR * S\%$$
where,  
PR = the annual production rate, in tons per year.  
S% = the average percentage of solvent in products, by weight.
  - c. The waste solvent, in tons per year, to be defined as "WS".
  - d. The annual OC emissions, in tons per year, to be defined as "YOC". "YOC" shall be calculated as follows:  
$$YOC = SU - SP - WS$$
  - e. The annual emission factor for this emissions unit, "EF", in ton OC per ton of solvent used. "EF" shall be calculated as follows:  
$$EF = YOC / SU$$

**C. Monitoring and/or Record Keeping Requirements (continued)**

2. To ensure compliance with the OC emission limits, the permittee shall keep following weekly records
  - a. Name or ID of each solvent used in this emissions unit.
  - b. Amount of each solvent used, "WS", in pounds per week. "WS" shall include the initial solvent loaded, adds in off-spec product, and solvent used to wash down vessels.
  - c. The total amount of solvent usage "TWS", in pounds per week. "TWS" equals to the summation, from  $i = 1$  to  $i = n$ , of  $(WS)_i$ , where:  
 $i$  = subscript denoting a solvent; and  
 $n$  = the number of different solvents.
  - d. The total operating days, "OD", in days per week.
  - e. The total operating hours, "OT", in hours per week
  - f. The weekly OC emissions, "WOC", in pounds. "WOC" shall be calculated as follows:  
 $WOC = TWS * EF$   
where, EF = emission factor, pound OC per pound of solvent used. See section F.1 of these terms and conditions.
  - g. The average daily OC emissions, "DOC", in pounds. "DOC" shall be calculated as follows  
 $DOC = WOC / OD$
  - h. The average hourly OC emissions, "HOC", in pounds. "HOC" shall be calculated as follows  
 $HOC = WOC / OT$
  - i. The rolling 52-week summations of OC emissions.
3. To ensure compliance with the HAP emission limits, the permittee shall keep following weekly records
  - a. Name or ID for each HAP employed in this emissions unit
  - b. The amount of each single HAP employed, "MH", in pounds per week
  - c. The weekly emissions of each single HAP from this emissions unit, "SHAP", in pounds. "SHAP" shall be calculated as follows:  
 $SHAPM = (MH / TWS) * WOC$   
where, "WOC" and "TWS" are as defined in section C.2 of these terms and conditions.
  - d. The total amount of combined HAPs emitted from this emissions unit, in pounds per week, to be defined as "THAP". "THAP" equals to the summation, from  $i = 1$  to  $i = n$ , of  $(SHAP)_i$ ,  
where  
 $i$  = subscript denoting a single HAP, and  
 $n$  = the number of different single HAPs.
4. The permittee shall keep the following rolling, 52-week summations, in tons, for this emissions unit and for emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 combined:
  - a. the emissions of each single HAP; and
  - b. the emissions of combined HAPs.
5. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on daily basis.

#### **D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which include the following information
  - a. An identification of each week during which the average OC emissions from this emissions unit exceeded 7.2 pounds per hour, and the actual average hourly OC emissions for each such week.
  - b. An identification of each week during which the average OC emissions from this emissions unit exceeded 40 pounds per day, and the actual average daily OC emissions from each such week.
  - c. An identification of each week during which the rolling, 52-week emissions of methanol from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 exceeded 6.01 tons per year, and the actual rolling, 52-week emissions of methanol for each such week.
  - d. An identification of each week during which the rolling, 52-week emissions of any single HAP, excluding methanol, from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 exceeded 9.03 tons per year, and the actual rolling, 52-week emissions of each such single HAP for each such week.
  - e. An identification of each week during which the rolling, 52-week emissions of combined HAPs from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 exceeded 19.14 tons per year, and the actual rolling, 52-week emissions of combined HAPs for each such week.
2. The permittee shall submit pressure drop deviation (excursion) reports that identify that all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in section B.1 of these terms and conditions.
3. All deviation (excursion) reports shall be submitted in accordance with section 3.b of the General Terms and Conditions.
4. The permittee shall submit annual reports that summarize the emissions of OC, each single HAP, and combined HAPs from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010. The reports shall include the emission calculations, shall be submitted by February 15 of each year, and shall cover the previous calendar year.
5. The permittee shall also submit annual reports that summarize the emission factor determination. The reports shall include the calculations, shall be submitted by February 15 of each year, and shall cover the previous calendar year.

## E. Testing Requirements

1. Compliance with the emission limitations in section A.1 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:  
20% opacity as a 6-minute average

Applicable Compliance Method: Compliance with visible particulate emission limitations shall be determined in accordance with the test methods and procedures in OAC Rule 3745-17-03 (B)(1).

- b. Emissions Limitation  
7.2 lbs/hour of VOC

Applicable Compliance Method: Compliance shall be based upon the record keeping specified in section C.2 of these terms and conditions.

- c. Emission Limitation:  
0.1 lb/hour of particulates

Applicable Compliance Method: Compliance shall be determined in accordance with the test methods and procedures in OAC rule 3745-17-03 (B)(10)(a), if required by Ohio EPA.

- d. Emissions Limitation:  
0.44 ton/year of particulates

Applicable Compliance Method: The ton per year limitations were developed by multiplying the pound per hour limitations by the maximum operating schedule of 8760 hours per year. Therefore, provided compliance is shown with the hourly limitations, compliance will also be shown with the annual limitations.

- e. Emission Limitation:  
7.2 tons/year of VOC

Applicable Compliance Method: Compliance shall be based upon the record keeping specified in section C.2 of these terms and conditions

**E. Testing Requirements (continued)**

2. Compliance with the emission limitations in section A.2 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:  
6.01 tons of methanol per year from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010, based upon rolling 52-week summations of the weekly emissions.  
  
Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section C.4 of these terms and conditions.
  - b. Emission Limitation:  
9.03 tons of each single HAP (excluding methanol) per year from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010, based upon rolling 52-week summations of the weekly emissions.  
  
Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section C.4 of these terms and conditions.
  - c. Emission Limitation:  
19.14 tons of combined HAPs per year from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010, based upon rolling 52-week summations of the weekly emissions.  
  
Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section C.4 of these terms and conditions.
  - d. Emissions Limitation  
40 lbs/day of OC  
  
Applicable Compliance Method: Compliance shall be based upon the record keeping specified in section C.2 of these terms and conditions.
3. Formulation data shall be used to determine the HAP and OC contents of each material used in this emissions unit.

**F. Miscellaneous Requirements**

1. The permittee shall calculate an emission factor each year for organic compound emissions. The emission factor shall be calculated by January 5 of each year, and shall be based upon the previous calendar year's operation. During the first year of operation following the issuance of this permit, the permittee has proposed and shall use a maximum emission factor of 0.008 ton OC emissions per ton of solvent usage. Beginning after the first year operation following the issuance of this permit, the permittee shall use the calculated OC emission factor for each calendar year.
2. Pursuant to OAC rule 3745-35-07, the following sections of these terms and conditions are federally enforceable: A - F.



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

TELE: (614) 644-3020 FAX: (614) 644-2329

03/11/04

**CERTIFIED MAIL**

**RE: Final Chapter 3745-35 Permit To Operate**

**P005 (D005) 60 HP Cowles**

Aexcel Corporation (02-43-08-1231)  
Lorie Webb  
7373 Production Drive  
Mentor, OH 44060

Dear Lorie Webb:

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action of the Director is final 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. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

**Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, Ohio 43215**

If you have any questions, please contact Northeast District Office.

Sincerely,

Michael W. Ahern  
Permit Issuance and Data Management Section  
Division of Air Pollution Control

Northeast District Office



State of Ohio Environmental Protection Agency

## Final Permit To Operate An Emissions Unit

Effective Date: 03/11/04

Expiration Date 03/11/09

This document constitutes issuance to

Facility ID: 02-43-08-1231  
Aexcel Corporation  
7373 Production Drive  
Mentor, OH 44060

of a permit to operate for:

P005 (D005)  
60 HP Cowles

You will be contacted six months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency identified below. This permit and the authorization to operate the air contaminant source (emissions unit) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC Chapter 3745-35 and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your permit:

Northeast District Office  
2110 East Aurora Road  
Twinsburg, OH 44087  
(330) 425-9171

This permit is granted subject to the conditions attached hereto.

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones  
Director

## **Part I: General Terms and Conditions**

### **1 Compliance Requirements**

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

### **2. Permit to Install Requirement**

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

### **3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements**

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

### **4. Records Retention Requirements**

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Such records may be maintained in computerized form.

### **5. Inspections and Information Requests**

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State and federal air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this

permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

**6. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions unit or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of this emissions unit(s) that is (are) served by such control system(s).

**7. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permittee. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

**8. Air Pollution Nuisance**

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

**9. Permit Renewal**

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the following Ohio EPA District Office or local air agency which has jurisdiction in the area in which the facility is located:

Northeast District Office  
2110 East Aurora Road  
Twinsburg, OH 44087  
(330) 425-9171

It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

**Part II: Special Terms and Conditions**

**A Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Industrial Paint Dispenser System #5, consisting of a disperser, letdown tanks, and filling stations.	OAC rule 3745-17-07	Except as provided by rule, the permittee shall not cause or allow the discharge of visible particulate emissions into the ambient air from any stack associated with this emissions unit greater than twenty percent (20%) opacity, as a six-minute average. Visible particulate emissions may exceed 20% opacity as a six-minute average, for not more than six consecutive minutes in any sixty minutes, but shall not exceed sixty percent (60%) opacity, as a six-minute average, at any time.
	OAC rule 3745-17-11	The particulate emission limit based upon this applicable rule is less stringent than the limit established pursuant to OAC rule 3745-31-05.
	OAC rule 3745-21-07 (G)(2)	The hourly organic compounds (OC) limit based upon this applicable rule is less stringent than the limit established pursuant to OAC rule 3745-31-05.
	OAC rule 3745-31-05 PTI No. 02-4672	The daily OC limit based upon this applicable rule is less stringent than the limit established pursuant to OAC rule 3745-35-07. See section A.2.d of these terms and conditions. The permittee shall not exceed the following limits:
		a. 7.2 pounds per hour and 7.2 tons per year of VOC; and
		b. 0.1 pound per hour and 0.44 ton per year of particulates.
	OAC rule 3745-35-07	See section A.2.a and A.2.d of these terms and conditions.

## 2. Additional Terms and Conditions

- 2.a The methanol emission from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 shall not exceed 6.01 tons per year, based upon rolling 52-week summations of the weekly emissions.
- 2.b The emissions of each single hazardous air pollutant (HAP) from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 shall not exceed 9.03 tons per year, based upon rolling 52-week summations of the weekly emissions.
- 2.c The emissions of the combined HAPs from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 shall not exceed 19.14 tons per year, based upon rolling 52-week summations of the weekly emissions.
- 2.d The organic compound emissions from this emissions unit shall not exceed 40 pounds per day. This limit applies to every day of operation, including any day when photochemically reactive materials are not employed in this emissions unit.

## B. Operational Restrictions

- 1. The pressure drop across the baghouse shall be maintained within the range of 2 to 5 inches of water while the emissions unit is in operation.

## C. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall keep the following information each year to determine an emission factor for this emissions unit:
  - a. The annual solvent usage, in tons per year, to be defined as "SU". "SU" shall include initial solvent loaded, adds in of off-spec product, and solvent used to wash down vessels,.
  - b. The solvent in production, in tons per year, to be defined as "SP". "SP" shall be calculated as follows:  
 $SP = PR * S\%$   
where,  
PR = the annual production rate, in tons per year.  
S% = the average percentage of solvent in products, by weight.
  - c. The waste solvent, in tons per year, to be defined as "WS".
  - d. The annual OC emissions, in tons per year, to be defined as "YOC". "YOC" shall be calculated as follows:  
 $YOC = SU - SP - WS$
  - e. The annual emission factor for this emissions unit, "EF", in ton OC per ton of solvent used. "EF" shall be calculated as follows:  
 $EF = YOC / SU$

**C. Monitoring and/or Record Keeping Requirements (continued)**

2. To ensure compliance with the OC emission limits, the permittee shall keep following weekly records

- a. Name or ID of each solvent used in this emissions unit.
- b. Amount of each solvent used, "WS", in pounds per week. "WS" shall include the initial solvent loaded, adds in off-spec product, and solvent used to wash down vessels.
- c. The total amount of solvent usage, "TWS", in pounds per week. "TWS" equals to the summation, from  $i = 1$  to  $i = n$ , of  $(WS)_i$ , where:  
 $i$  = subscript denoting a solvent, and  
 $n$  = the number of different solvents.
- d. The total operating days, "OD", in days per week.
- e. The total operating hours, "OT", in hours per week
- f. The weekly OC emissions, "WOC", in pounds. "WOC" shall be calculated as follows:  
 $WOC = TWS * EF$   
 where, EF = emission factor, pound OC per pound of solvent used. See section F.1 of these terms and conditions.
- g. The average daily OC emissions, "DOC", in pounds. "DOC" shall be calculated as follows  
 $DOC = WOC / OD$
- h. The average hourly OC emissions, "HOC", in pounds. "HOC" shall be calculated as follows  
 $HOC = WOC / OT$
- i. The rolling 52-week summations of OC emissions.

3. To ensure compliance with the HAP emission limits, the permittee shall keep following weekly records

- a. Name or ID for each HAP employed in this emissions unit.
- b. The amount of each single HAP employed, "MH", in pounds per week.
- c. The weekly emissions of each single HAP from this emissions unit, "SHAP", in pounds. "SHAP" shall be calculated as follows:  
 $SHAPM = (MH / TWS) * WOC$   
 where, "WOC" and "TWS" are as defined in section C.2 of these terms and conditions.
- d. The total amount of combined HAPs emitted from this emissions unit, in pounds per week, to be defined as "THAP". "THAP" equals to the summation, from  $i = 1$  to  $i = n$ , of  $(SHAP)_i$ ,  
 where  
 $i$  = subscript denoting a single HAP, and  
 $n$  = the number of different single HAPs.

4. The permittee shall keep the following rolling, 52-week summations, in tons, for this emissions unit and for emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 combined:

- a. the emissions of each single HAP; and
- b. the emissions of combined HAPs.

5. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on daily basis.

**D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which include the following information
  - a. An identification of each week during which the average OC emissions from this emissions unit exceeded 7.2 pounds per hour, and the actual average hourly OC emissions for each such week.
  - b. An identification of each week during which the average OC emissions from this emissions unit exceeded 40 pounds per day, and the actual average daily OC emissions for each such week.
  - c. An identification of each week during which the rolling, 52-week emissions of methanol from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 exceeded 6.01 tons per year, and the actual rolling, 52-week emissions of methanol for each such week.
  - d. An identification of each week during which the rolling, 52-week emissions of any single HAP, excluding methanol, from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 exceeded 9.03 tons per year, and the actual rolling, 52-week emissions of each such single HAP for each such week.
  - e. An identification of each week during which the rolling, 52-week emissions of combined HAPs from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 exceeded 19.14 tons per year, and the actual rolling, 52-week emissions of combined HAPs for each such week.
2. The permittee shall submit pressure drop deviation (excursion) reports that identify that all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in section B.1 of these terms and conditions.
3. All deviation (excursion) reports shall be submitted in accordance with section 3.b of the General Terms and Conditions.
4. The permittee shall submit annual reports that summarize the emissions of OC, each single HAP, and combined HAPs from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010. The reports shall include the emission calculations, shall be submitted by February 15 of each year, and shall cover the previous calendar year.
5. The permittee shall also submit annual reports that summarize the emission factor determination. The reports shall include the calculations, shall be submitted by February 15 of each year, and shall cover the previous calendar year.

**E. Testing Requirements**

1. Compliance with the emission limitations in section A.1 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:  
20% opacity as a 6-minute average

Applicable Compliance Method: Compliance with visible particulate emission limitations shall be determined in accordance with the test methods and procedures in OAC Rule 3745-17-03 (B)(1).

- b. Emissions Limitation  
7.2 lbs/hour of VOC

Applicable Compliance Method: Compliance shall be based upon the record keeping specified in section C.2 of these terms and conditions

- c. Emission Limitation:  
0.1 lb/hour of particulates

Applicable Compliance Method: Compliance shall be determined in accordance with the test methods and procedures in OAC rule 3745-17-03 (B)(10)(a), if required by Ohio EPA.

- d. Emissions Limitation:  
0.44 ton/year of particulates

Applicable Compliance Method: The ton per year limitations were developed by multiplying the pound per hour limitations by the maximum operating schedule of 8760 hours per year. Therefore, provided compliance is shown with the hourly limitations, compliance will also be shown with the annual limitations.

- e. Emission Limitation  
7.2 tons/year of VOC

Applicable Compliance Method: Compliance shall be based upon the record keeping specified in section C.2 of these terms and conditions.

**E. Testing Requirements (continued)**

2. Compliance with the emission limitations in section A.2 of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

6.01 tons of methanol per year from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010, based upon rolling 52-week summations of the weekly emissions.

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section C.4 of these terms and conditions.

b. Emission Limitation:

9.03 tons of each single HAP (excluding methanol) per year from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010, based upon rolling 52-week summations of the weekly emissions.

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section C.4 of these terms and conditions.

c. Emission Limitation:

19.14 tons of combined HAPs per year from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010, based upon rolling 52-week summations of the weekly emissions.

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section C.4 of these terms and conditions.

d. Emissions Limitation:

40 lbs/day of OC

Applicable Compliance Method: Compliance shall be based upon the record keeping specified in section C.2 of these terms and conditions.

3. Formulation data shall be used to determine the HAP and organic compound contents of each material used in this emissions unit.

**F. Miscellaneous Requirements**

1. The permittee shall calculate an emission factor each year for organic compound emissions. The emission factor shall be calculated by January 5 of each year, and shall be based upon the previous calendar year's operation. During the first year of operation following the issuance of this permit, the permittee has proposed and shall use a maximum emission factor of 0.008 ton OC emissions per ton of solvent usage. Beginning after the first year operation following the issuance of this permit, the permittee shall use the calculated OC emission factor for each calendar year.
2. Pursuant to OAC rule 3745-35-07, the following sections of these terms and conditions are federally enforceable: A - F.



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

TELE: (614) 644-3020 FAX: (614) 644-2329

03/11/04

**CERTIFIED MAIL**

**RE: Final Chapter 3745-35 Permit To Operate**

**P006 (D006) 50 HP Hockmeyer**

Aexcel Corporation (02-43-08-1231)  
Lorie Webb  
7373 Production Drive  
Mentor, OH 44060

Dear Lorie Webb

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action of the Director is final 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. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, Ohio 43215

If you have any questions, please contact Northeast District Office.

Sincerely,

Michael W. Ahern  
Permit Issuance and Data Management Section  
Division of Air Pollution Control

cc: Northeast District Office



State of Ohio Environmental Protection Agency

## Final Permit To Operate An Emissions Unit

Effective Date: 03/11/04

Expiration Date: 03/11/09

This document constitutes issuance to:

Facility ID: 02-43-08-1231  
Aexcel Corporation  
7373 Production Drive  
Mentor, OH 44060

of a permit to operate for:

P006 (D006)  
50 HP Hockmeyer

You will be contacted six months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency identified below. This permit and the authorization to operate the air contaminant source (emissions unit) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC Chapter 3745-35 and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your permit:

Northeast District Office  
2110 East Aurora Road  
Twinsburg, OH 44087  
(330) 425-9171

This permit is granted subject to the conditions attached hereto.

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones  
Director

## **Part I: General Terms and Conditions**

### **1. Compliance Requirements**

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

### **2. Permit to Install Requirement**

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

### **3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements**

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

### **4. Records Retention Requirements**

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Such records may be maintained in computerized form.

### **5. Inspections and Information Requests**

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State and federal air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this

permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

**6. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions unit or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of this emissions unit(s) that is (are) served by such control system(s).

**7. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permittee. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

**8. Air Pollution Nuisance**

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

**9. Permit Renewal**

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the following Ohio EPA District Office or local air agency which has jurisdiction in the area in which the facility is located:

Northeast District Office  
2110 East Aurora Road  
Twinsburg, OH 44087  
(330) 425-9171

It is the permittee's responsibility to renew this permit even if no notice of its expiration is received

## Part II: Special Terms and Conditions

### A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Industrial Paint Dispenser System #6, consisting of a disperser, letdown tanks, and filling stations.	OAC rule 3745-17-07	Except as provided by rule, the permittee shall not cause or allow the discharge of visible particulate emissions into the ambient air from any stack associated with this emissions unit greater than twenty percent (20%) opacity, as a six-minute average. Visible particulate emissions may exceed 20% opacity as a six-minute average, for not more than six consecutive minutes in any sixty minutes, but shall not exceed sixty percent (60%) opacity, as a six-minute average, at any time.
	OAC rule 3745-17-11	The particulate emission limit based upon this applicable rule is less stringent than the limit established pursuant to OAC rule 3745-31-05.
	OAC rule 3745-21-07 (G)(2)	The hourly organic compounds (OC) limit based upon this applicable rule is less stringent than the limit established pursuant to OAC rule 3745-31-05.
	OAC rule 3745-31-05 PTI No. 02-4672	The daily OC limit based upon this applicable rule is less stringent than the limit established pursuant to OAC rule 3745-35-07. See section A.2.d of these terms and conditions. The permittee shall not exceed the following limits:
		a. 6.0 pounds per hour and 6.24 tons per year of VOC; and
		b. 0.1 pound per hour and 0.44 ton per year of particulates.
	OAC rule 3745-35-07	See section A.2.a and A.2.d of these terms and conditions.

## 2 Additional Terms and Conditions

- 2.a The methanol emission from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 shall not exceed 6.01 tons per year, based upon rolling 52-week summations of the weekly emissions.
- 2.b The emissions of each single hazardous air pollutant (HAP) from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 shall not exceed 9.03 tons per year, based upon rolling 52-week summations of the weekly emissions.
- 2.c The emissions of the combined HAPs from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 shall not exceed 19.14 tons per year, based upon rolling 52-week summations of the weekly emissions.
- 2.d The organic compound emissions from this emissions unit shall not exceed 40 pounds per day. This limit applies to every day of operation, including any day when photochemically reactive materials are not employed in this emissions unit.

## B Operational Restrictions

- 1. The pressure drop across the baghouse shall be maintained within the range of 2 to 5 inches of water while the emissions unit is in operation.

## C Monitoring and/or Record Keeping Requirements

- 1. The permittee shall keep the following information each year to determine an emission factor for this emissions unit:
  - a. The annual solvent usage, in tons per year, to be defined as "SU". "SU" shall include initial solvent loaded, adds in of off-spec product, and solvent used to wash down vessels,.
  - b. The solvent in production, in tons per year, to be defined as "SP". "SP" shall be calculated as follows:  
$$SP = PR * S\%$$
where,  
PR = the annual production rate, in tons per year.  
S% = the average percentage of solvent in products, by weight.  
  
The waste solvent, in tons per year, to be defined as "WS".
  - d. The annual OC emissions, in tons per year, to be defined as "YOC". "YOC" shall be calculated as follows:  
$$YOC = SU - SP - WS$$
  - e. The annual emission factor for this emissions unit, "EF", in ton OC per ton of solvent used. "EF" shall be calculated as follows:  
$$EF = YOC / SU$$

**C Monitoring and/or Record Keeping Requirements (continued)**

2. To ensure compliance with the OC emission limits, the permittee shall keep following weekly records:
- a Name or ID of each solvent used in this emissions unit
  - b Amount of each solvent used, "WS", in pounds per week. "WS" shall include the initial solvent loaded, adds in off-spec product, and solvent used to wash down vessels.
  - c The total amount of solvent usage, "TWS", in pounds per week. "TWS" equals to the summation, from  $i = 1$  to  $i = n$ , of  $(WS)_i$ , where:  
 $i$  = subscript denoting a solvent, and  
 $n$  = the number of different solvents.
  - d The total operating days, "OD", in days per week
  - e The total operating hours, "OT", in hours per week
  - f The weekly OC emissions, "WOC", in pounds. "WOC" shall be calculated as follows:  
 $WOC = TWS * EF$   
where, EF = emission factor, pound OC per pound of solvent used. See section F.1 of these terms and conditions.
  - g The average daily OC emissions, "DOC", in pounds. "DOC" shall be calculated as follows:  
 $DOC = WOC / OD$
  - h The average hourly OC emissions, "HOC", in pounds. "HOC" shall be calculated as follows:  
 $HOC = WOC / OT$
  - i The rolling 52-week summations of OC emissions.
3. To ensure compliance with the HAP emission limits, the permittee shall keep following weekly records
- a Name or ID for each HAP employed in this emissions unit
  - b The amount of each single HAP employed, "MH", in pounds per week
  - c The weekly emissions of each single HAP from this emissions unit, "SHAP", in pounds. "SHAP" shall be calculated as follows:  
 $SHAPM = (MH / TWS) * WOC$   
where, "WOC" and "TWS" are as defined in section C.2 of these terms and conditions.
  - d The total amount of combined HAPs emitted from this emissions unit, in pounds per week, to be defined as "THAP". "THAP" equals to the summation, from  $i = 1$  to  $i = n$ , of  $(SHAP)_i$ ,  
where  
 $i$  = subscript denoting a single HAP, and  
 $n$  = the number of different single HAPs.
4. The permittee shall keep the following rolling, 52-week summations, in tons, for this emissions unit and for emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 combined:
- a the emissions of each single HAP; and
  - b the emissions of combined HAPs.
5. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on daily basis.

#### **D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. An identification of each week during which the average OC emissions from this emissions unit exceeded 6.0 pounds per hour, and the actual average hourly OC emissions for each such week.
  - b. An identification of each week during which the average OC emissions from this emissions unit exceeded 40 pounds per day, and the actual average daily OC emissions for each such week.
  - c. An identification of each week during which the rolling, 52-week emissions of methanol from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 exceeded 6.01 tons per year, and the actual rolling, 52-week emissions of methanol for each such week.
  - d. An identification of each week during which the rolling 52-week emissions of any single HAP, excluding methanol, from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 exceeded 9.03 tons per year, and the actual rolling, 52-week emissions of each such single HAP for each such week.
  - e. An identification of each week during which the rolling, 52-week emissions of combined HAPs from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 exceeded 19.14 tons per year, and the actual rolling, 52-week emissions of combined HAPs for each such week.
2. The permittee shall submit pressure drop deviation (excursion) reports that identify that all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in section B.1 of these terms and conditions.
3. All deviation (excursion) reports shall be submitted in accordance with section 3.b of the General Terms and Conditions.
4. The permittee shall submit annual reports that summarize the emissions of OC, each single HAP, and combined HAPs from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010. The reports shall include the emission calculations, shall be submitted by February 15 of each year, and shall cover the previous calendar year.
5. The permittee shall also submit annual reports that summarize the emission factor determination. The reports shall include the calculations, shall be submitted by February 15 of each year, and shall cover the previous calendar year.

## E. Testing Requirements

1. Compliance with the emission limitations in section A.1 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:  
20% opacity as a 6-minute average

Applicable Compliance Method: Compliance with visible particulate emission limitations shall be determined in accordance with the test methods and procedures in OAC Rule 3745-17-03 (B)(1).

- b. Emissions Limitation:  
6.0 lbs/hour of VOC

Applicable Compliance Method: Compliance shall be based upon the record keeping specified in section C.2 of these terms and conditions.

- c. Emission Limitation:  
0.1 lb/hour of particulates

Applicable Compliance Method: Compliance shall be determined in accordance with the test methods and procedures in OAC rule 3745-17-03 (B)(10)(a), if required by Ohio EPA.

- d. Emissions Limitation:  
0.44 ton/year of particulates

Applicable Compliance Method: The ton per year limitations were developed by multiplying the pound per hour limitations by the maximum operating schedule of 8760 hours per year. Therefore, provided compliance is shown with the hourly limitations, compliance will also be shown with the annual limitations.

- e. Emission Limitation:  
6.24 tons/year of VOC

Applicable Compliance Method: Compliance shall be based upon the record keeping specified in section C.2 of these terms and conditions.

**E. Testing Requirements (continued)**

2. Compliance with the emission limitations in section A.2 of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

6.01 tons of methanol per year from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010, based upon rolling 52-week summations of the weekly emissions.

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section C.4 of these terms and conditions.

b. Emission Limitation:

9.03 tons of each single HAP per year from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010, based upon rolling 52-week summations of the weekly emissions.

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section C.4 of these terms and conditions.

c. Emission Limitation:

19.14 tons of combined HAPs per year from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010, based upon rolling 52-week summations of the weekly emissions.

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section C.4 of these terms and conditions.

d. Emissions Limitation  
40 lbs/day of OC

Applicable Compliance Method: Compliance shall be based upon the record keeping specified in section C.2 of these terms and conditions.

3. Formulation data shall be used to determine the HAP and organic compound contents of each material used in this emissions unit.

**F. Miscellaneous Requirements**

1. The permittee shall calculate an emission factor each year for organic compound emissions. The emission factor shall be calculated by January 5 of each year, and shall be based upon the previous calendar year's operation. During the first year of operation following the issuance of this permit, the permittee has proposed and shall use a maximum emission factor of 0.008 ton OC emissions per ton of solvent usage. Beginning after the first year operation following the issuance of this permit, the permittee shall use the calculated OC emission factor for each calendar year.
2. Pursuant to OAC rule 3745-35-07, the following sections of these terms and conditions are federally enforceable: A - F.



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

TELE: (614) 644-3020 FAX: (614) 644-2329

03/11/04

**CERTIFIED MAIL**

**RE: Final Chapter 3745-35 Permit To Operate**

**P007 (D007) 50 HP Hockmeyer**

Aexcel Corporation (02-43-08-1231)  
Lorie Webb  
7373 Production Drive  
Mentor, OH 44060

Dear Lorie Webb:

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action of the Director is final 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. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, Ohio 43215

If you have any questions, please contact Northeast District Office

Sincerely,

Michael W. Ahern  
Permit Issuance and Data Management Section  
Division of Air Pollution Control

cc: Northeast District Office



State of Ohio Environmental Protection Agency

## Final Permit To Operate An Emissions Unit

Effective Date: 03/11/04

Expiration Date: 03/11/09

This document constitutes issuance to:

Facility ID: 02-43-08-1231  
Aexcel Corporation  
7373 Production Drive  
Mentor, OH 44060

of a permit to operate for:

P007 (D007)  
50 HP Hockmeyer

You will be contacted six months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency identified below. This permit and the authorization to operate the air contaminant source (emissions unit) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC Chapter 3745-35 and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your permit:

Northeast District Office  
2110 East Aurora Road  
Twinsburg, OH 44087  
(330) 425-9171

This permit is granted subject to the conditions attached hereto.

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones  
Director

## **Part I: General Terms and Conditions**

### **1. Compliance Requirements**

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

### **2. Permit to Install Requirement**

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

### **3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements**

The permittee shall submit required reports in the following manner

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

### **4. Records Retention Requirements**

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Such records may be maintained in computerized form.

### **5. Inspections and Information Requests**

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State and federal air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this

permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

**6. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions unit or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of this emissions unit(s) that is (are) served by such control system(s).

**7. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permittee. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

**8. Air Pollution Nuisance**

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

**9. Permit Renewal**

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the following Ohio EPA District Office or local air agency which has jurisdiction in the area in which the facility is located:

Northeast District Office  
2110 East Aurora Road  
Twinsburg, OH 44087  
(330) 425-9171

It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

**Part II: Special Terms and Conditions**

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Industrial Paint Dispenser System #4, consisting of a disperser, letdown tanks, and filling stations.	OAC rule 3745-17-07	Except as provided by rule, the permittee shall not cause or allow the discharge of visible particulate emissions into the ambient air from any stack associated with this emissions unit greater than twenty percent (20%) opacity, as a six-minute average. Visible particulate emissions may exceed 20% opacity as a six-minute average, for not more than six consecutive minutes in any sixty minutes, but shall not exceed sixty percent (60%) opacity, as a six-minute average, at any time.
	OAC rule 3745-17-11	The particulate emission limit based upon this applicable rule is less stringent than the limit established pursuant to OAC rule 3745-31-05.
	OAC rule 3745-21-07 (G)(2)	The hourly organic compounds (OC) limit based upon this applicable rule is less stringent than the limit established pursuant to OAC rule 3745-31-05.
	OAC rule 3745-31-05 PTI No. 02-4672	The daily OC limit based upon this applicable rule is less stringent than the limit established pursuant to OAC rule 3745-35-07. See section A.2.d of these terms and conditions. The permittee shall not exceed the following limits:
	a. 2.4 pounds per hour and 2.4 tons per year of VOC; and	b. 0.1 pound per hour and 0.44 ton per year of particulates.
	OAC rule 3745-35-07	See section A.2.a and A.2.d of these terms and conditions.

## 2. Additional Terms and Conditions

- 2.a The methanol emission from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 shall not exceed 6.01 tons per year, based upon rolling 52-week summations of the weekly emissions.
- 2.b The emissions of each single hazardous air pollutant (HAP) from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 shall not exceed 9.03 tons per year, based upon rolling 52-week summations of the weekly emissions.
- 2.c The emissions of the combined HAPs from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 shall not exceed 19.14 tons per year, based upon rolling 52-week summations of the weekly emissions.
- 2.d The organic compound emissions from this emissions unit shall not exceed 40 pounds per day. This limit applies to every day of operation, including any day when photochemically reactive materials are not employed in this emissions unit.

## B. Operational Restrictions

- 1. The pressure drop across the baghouse shall be maintained within the range of 2 to 5 inches of water while the emissions unit is in operation.

## C. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall keep the following information each year to determine an emission factor for this emissions unit:
  - a. The annual solvent usage, in tons per year, to be defined as "SU". "SU" shall include initial solvent loaded, adds in of off-spec product, and solvent used to wash down vessels,.
  - b. The solvent in production, in tons per year, to be defined as "SP". "SP" shall be calculated as follows:  
$$SP = PR * S\%$$
where,  
PR = the annual production rate, in tons per year.  
S% = the average percentage of solvent in products, by weight.
  - c. The waste solvent, in tons per year, to be defined as "WS".
  - d. The annual OC emissions, in tons per year, to be defined as "YOC". "YOC" shall be calculated as follows:  
$$YOC = SU - SP - WS$$
  - e. The annual emission factor for this emissions unit, "EF", in ton OC per ton of solvent used. "EF" shall be calculated as follows:  
$$EF = YOC / SU$$

**C Monitoring and/or Record Keeping Requirements (continued)**

2. To ensure compliance with the OC emission limits, the permittee shall keep following weekly records:

- a. Name or ID of each solvent used in this emissions unit.
- b. Amount of each solvent used, "WS", in pounds per week. "WS" shall include the initial solvent loaded adds in off-spec product, and solvent used to wash down vessels.
- c. The total amount of solvent usage, "TWS", in pounds per week. "TWS" equals to the summation, from  $i = 1$  to  $i = n$ , of  $(WS)_i$ , where:  
 $i$  = subscript denoting a solvent, and  
 $n$  = the number of different solvents.
- d. The total operating days, "OD", in days per week.
- e. The total operating hours, "OT", in hours per week.
- f. The weekly OC emissions, "WOC", in pounds. "WOC" shall be calculated as follows:  
 $WOC = TWS * EF$   
where, EF = emission factor, pound OC per pound of solvents used. See section F.1 of these terms and conditions.
- g. The average daily OC emissions, "DOC", in pounds. "DOC" shall be calculated as follows  
 $DOC = WOC / OD$
- h. The average hourly OC emissions, "HOC", in pounds. "HOC" shall be calculated as follows:  
 $HOC = WOC / OT$
- i. The rolling 52-week summations of OC emissions.

3. To ensure compliance with the HAP emission limits, the permittee shall keep following weekly records:

- a. Name or ID for each HAP employed in this emissions unit
- b. The amount of each single HAP employed, "MH", in pounds per week.
- c. The weekly emissions of each single HAP from this emissions unit, "SHAP", in pounds. "SHAP" shall be calculated as follows:  
 $SHAPM = (MH / TWS) * WOC$   
where, "WOC" and "TWS" are as defined in section C.2 of these terms and conditions.
- d. The total amount of combined HAPs emitted from this emissions unit, in pounds per week, to be defined as "THAP". "THAP" equals to the summation, from  $i = 1$  to  $i = n$ , of  $(SHAP)_i$ ,  
where  
 $i$  = subscript denoting a single HAP, and  
 $n$  = the number of different single HAPs.

4. The permittee shall keep the following rolling, 52-week summations, in tons, for this emissions unit and for emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 combined:

- a. the emissions of each single HAP; and
- b. the emissions of combined HAPs.

5. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on daily basis.

**D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. An identification of each week during which the average OC emissions from this emissions unit exceeded 2.4 pounds per hour, and the actual average hourly OC emissions for each such week.
  - b. An identification of each week during which the average OC emissions from this emissions unit exceeded 40 pounds per day, and the actual average daily OC emissions for each such week.
  - c. An identification of each week during which the rolling, 52-week emissions of methanol from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 exceeded 6.01 tons per year, and the actual rolling, 52-week emissions of methanol for each such week.
  - d. An identification of each week during which the rolling, 52-week emissions of any single HAP, excluding methanol, from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 exceeded 9.03 tons per year, and the actual rolling, 52-week emissions of each such single HAP for each such week.
  - e. An identification of each week during which the rolling, 52-week emissions of combined HAPs from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 exceeded 19.14 tons per year, and the actual rolling, 52-week emissions of combined HAPs for each such week.
2. The permittee shall submit pressure drop deviation (excursion) reports that identify that all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in section B.1 of these terms and conditions.
3. All deviation (excursion) reports shall be submitted in accordance with section 3.b of the General Terms and Conditions.
4. The permittee shall submit annual reports that summarize the emissions of OC, each single HAP, and combined HAPs from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010. The reports shall include the emission calculations, shall be submitted by February 15 of each year, and shall cover the previous calendar year.
5. The permittee shall also submit annual reports that summarize the emission factor determination. The reports shall include the calculations, shall be submitted by February 15 of each year, and shall cover the previous calendar year.

## **E. Testing Requirements**

1. Compliance with the emission limitations in section A.1 of these terms and conditions shall be determined in accordance with the following methods:

- a. **Emission Limitation:**  
20% opacity as a 6-minute average

**Applicable Compliance Method:** Compliance with visible particulate emission limitations shall be determined in accordance with the test methods and procedures in OAC Rule 3745-17-03 (B)(1).

- b. **Emissions Limitation:**  
2.4 lbs/hour of VOC

**Applicable Compliance Method:** Compliance shall be based upon the record keeping specified in section C.2 of these terms and conditions.

- c. **Emission Limitation:**  
0.1 lb/hour of particulates

**Applicable Compliance Method:** Compliance shall be determined in accordance with the test methods and procedures in OAC rule 3745-17-03 (B)(10)(a), if required by Ohio EPA.

- d. **Emissions Limitation:**  
0.44 ton/year of particulates

**Applicable Compliance Method:** The ton per year limitations were developed by multiplying the pound per hour limitations by the maximum operating schedule of 8760 hours per year. Therefore, provided compliance is shown with the hourly limitations, compliance will also be shown with the annual limitations.

- e. **Emission Limitation:**  
2.4 tons/year of VOC

**Applicable Compliance Method:** Compliance shall be based upon the record keeping specified in section C.2 of these terms and conditions.

**E. Testing Requirements (continued)**

2. Compliance with the emission limitations in section A.2 of these terms and conditions shall be determined in accordance with the following methods:
  - a. **Emission Limitation:**  
6.01 tons of methanol per year from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010, based upon rolling 52-week summations of the weekly emissions.  
  
Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section C.4 of these terms and conditions.
  - b. **Emission Limitation:**  
9.03 tons of each single HAP per year from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010, based upon rolling 52-week summations of the weekly emissions.  
  
Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section C.4 of these terms and conditions.
  - c. **Emission Limitation:**  
19.14 tons of combined HAPs per year from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010, based upon rolling 52-week summations of the weekly emissions.  
  
Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section C.4 of these terms and conditions.
  - d. **Emissions Limitation**  
40 lbs/day of OC  
  
Applicable Compliance Method: Compliance shall be based upon the record keeping specified in section C.2 of these terms and conditions.
3. Formulation data shall be used to determine the HAP and organic compound contents of each material used in this emissions unit.

**F. Miscellaneous Requirements**

1. The permittee shall calculate an emission factor each year for organic compound emissions. The emission factor shall be calculated by January 5 of each year, and shall be based upon the previous calendar year's operation. During the first year of operation following the issuance of this permit, the permittee has proposed and shall use a maximum emission factor of 0.008 ton OC emissions per ton of solvent usage. Beginning after the first year operation following the issuance of this permit, the permittee shall use the calculated OC emission factor for each calendar year.
2. Pursuant to OAC rule 3745-35-07, the following sections of these terms and conditions are federally enforceable: A - F.



State of Ohio Environmental Protection Agency

Street Address: \_\_\_\_\_

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address  
Lazarus Gov. Center  
P.O. Box 1049  
Columbus, OH 43216-1049

03/11/04

**CERTIFIED MAIL**  
**RE: Final Chapter 3745-35 Permit To Operate**

**P008 (D008) 25 HP Cowles**

Aexcel Corporation (02-43-08-1231)  
Lorie Webb  
7373 Production Drive  
Mentor, OH 44060

Dear Lorie Webb:

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action of the Director is final 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. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

**Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, Ohio 43215**

If you have any questions, please contact Northeast District Office.

Sincerely,

**Michael W. Ahern  
Permit Issuance and Data Management Section  
Division of Air Pollution Control**

cc: Northeast District Office



State of Ohio Environmental Protection Agency

## Final Permit To Operate An Emissions Unit

Effective Date: 03/11/04

Expiration Date: 03/11/09

This document constitutes issuance to:

Facility ID: 02-43-08-1231  
Aexcel Corporation  
7373 Production Drive  
Mentor, OH 44060

of a permit to operate for:

P008 (D008)  
25 HP Cowles

You will be contacted six months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency identified below. This permit and the authorization to operate the air contaminant source (emissions unit) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC Chapter 3745-35 and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your permit:

Northeast District Office  
2110 East Aurora Road  
Twinsburg, OH 44087  
(330) 425-9171

This permit is granted subject to the conditions attached hereto.

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones  
Director

## **Part I: General Terms and Conditions**

### **1. Compliance Requirements**

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

### **2. Permit to Install Requirement**

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

### **3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements**

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

### **4. Records Retention Requirements**

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Such records may be maintained in computerized form.

### **5. Inspections and Information Requests**

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State and federal air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this

permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

**6. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions unit or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of this emissions unit(s) that is (are) served by such control system(s).

**7. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permittee. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

**8. Air Pollution Nuisance**

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

**9. Permit Renewal**

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the following Ohio EPA District Office or local air agency which has jurisdiction in the area in which the facility is located:

Northeast District Office  
2110 East Aurora Road  
Twinsburg, OH 44087  
(330) 425-9171

It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

## Part II: Special Terms and Conditions

### A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Industrial Paint Dispenser System #8 consist of a disperser, letdown tanks, and filling stations.	OAC rule 3745-17-07	Except as provided by rule, the permittee shall not cause or allow the discharge of visible particulate emissions into the ambient air from any stack associated with this emissions unit greater than twenty percent (20%) opacity, as a six-minute average. Visible particulate emissions may exceed 20% opacity as a six-minute average, for not more than six consecutive minutes in any sixty minutes, but shall not exceed sixty percent (60%) opacity, as a six-minute average, at any time.
	OAC rule 3745-17-11	The particulate emission limit based upon this applicable rule is less stringent than the limit established pursuant to OAC rule 3745-31-05.
	OAC rule 3745-21-07 (G)(2)	The hourly organic compounds (OC) limit based upon this applicable rule is less stringent than the limit established pursuant to OAC rule 3745-31-05.
	OAC rule 3745-31-05 PTI No. 02-4672	The daily OC limit based upon this applicable rule is less stringent than the limit established pursuant to OAC rule 3745-35-07. See section A.2.d of these terms and conditions. The permittee shall not exceed the following limits:
	OAC rule 3745-35-07	<ul style="list-style-type: none"> <li>a. 3.4 pounds per hour and 3.36 tons per year of VOC; and</li> <li>b. 0.1 pound per hour and 0.44 ton per year of particulates.</li> </ul> See section A.2.a and A.2.d of these terms and conditions.

## 2. Additional Terms and Conditions

- 2.a The methanol emission from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 shall not exceed 6.01 tons per year, based upon rolling 52-week summations of the weekly emissions.
- 2.b The emissions of each single hazardous air pollutant (HAP) from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 shall not exceed 9.03 tons per year, based upon rolling 52-week summations of the weekly emissions.
- 2.c The emissions of the combined HAPs from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 shall not exceed 19.14 tons per year, based upon rolling 52-week summations of the weekly emissions.
- 2.d The organic compound emissions from this emissions unit shall not exceed 40 pounds per day. This limit applies to every day of operation, including any day when photochemically reactive materials are not employed in this emissions unit.

## B. Operational Restrictions

- 1. The pressure drop across the baghouse shall be maintained within the range of 2 to 5 inches of water while the emissions unit is in operation.

## C. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall keep the following information each year to determine an emission factor for this emissions unit:
  - a. The annual solvent usage, in tons per year, to be defined as "SU". "SU" shall include initial solvent loaded, adds in of off-spec product, and solvent used to wash down vessels,.
  - b. The solvent in production, in tons per year, to be defined as "SP". "SP" shall be calculated as follows  
$$SP = PR * S\%$$
where,  
PR = the annual production rate, in tons per year.  
S% = the average percentage of solvent in products, by weight.
  - c. The waste solvent, in tons per year, to be defined as "WS".
  - d. The annual OC emissions, in tons per year, to be defined as "YOC". "YOC" shall be calculated as follows:  
$$YOC = SU - SP - WS$$
  - e. The annual emission factor for this emissions unit, "EF", in ton OC per ton of solvent used. "EF" shall be calculated as follows:  
$$EF = YOC / SU$$

**C. Monitoring and/or Record Keeping Requirements (continued)**

2. To ensure compliance with the OC emission limits, the permittee shall keep following weekly records:
- Name or ID of each solvent used in this emissions unit.
  - Amount of each solvent used, "WS", in pounds per week. "WS" shall include the initial solvent loaded, adds in off-spec product, and solvent used to wash down vessels.
  - The total amount of solvent usage, "TWS", in pounds per week. "TWS" equals to the summation, from  $i = 1$  to  $i = n$ , of  $(WS)_i$ , where:  
 $i$  = subscript denoting a solvent, and  
 $n$  = the number of different solvents.
  - The total operating days, "OD", in days per week.
  - The total operating hours, "OT", in hours per week.
  - The weekly OC emissions, "WOC", in pounds. "WOC" shall be calculated as follows:  
 $WOC = TWS * EF$   
where, EF = emission factor, pound OC per pound of solvent used. See section F.1 of these terms and conditions.
  - The average daily OC emissions, "DOC", in pounds. "DOC" shall be calculated as follows:  
 $DOC = WOC / OD$
  - The average hourly OC emissions, "HOC", in pounds. "HOC" shall be calculated as follows:  
 $HOC = WOC / OT$
  - The rolling 52-week summations of OC emissions.
3. To ensure compliance with the HAP emission limits, the permittee shall keep following weekly records:
- Name or ID for each HAP employed in this emissions unit.
  - The amount of each single HAP employed, "MH", in pounds per week.
  - The weekly emissions of each single HAP from this emissions unit, "SHAP", in pounds. "SHAP" shall be calculated as follows:  
 $SHAPM = (MH / TWS) * WOC$   
where, "WOC" and "TWS" are as defined in section C.2 of these terms and conditions.
  - The total amount of combined HAPs emitted from this emissions unit, in pounds per week, to be defined as "THAP". "THAP" equals to the summation, from  $i = 1$  to  $i = n$ , of  $(SHAP)_i$ , where  
 $i$  = subscript denoting a single HAP, and  
 $n$  = the number of different single HAPs.
4. The permittee shall keep the following rolling, 52-week summations, in tons, for this emissions unit and for emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 combined:
- the emissions of each single HAP; and
  - the emissions of combined HAPs.
5. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on daily basis.

#### **D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. An identification of each week during which the average OC emissions from this emissions unit exceeded 3.4 pounds per hour, and the actual average hourly OC emissions for each such week.
  - b. An identification of each week during which the average OC emissions from this emissions unit exceeded 40 pounds per day, and the actual average daily OC emissions for each such week.
  - c. An identification of each week during which the rolling, 52-week emissions of methanol from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 exceeded 6.01 tons per year, and the actual rolling, 52-week emissions of methanol for each such week.
  - d. An identification of each week during which the rolling, 52-week emissions of any single HAP, excluding methanol, from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 exceeded 9.03 tons per year, and the actual rolling, 52-week emissions of each such single HAP for each such week.
  - e. An identification of each week during which the rolling, 52-week emissions of combined HAPs from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 exceeded 19.14 tons per year, and the actual rolling, 52-week emissions of combined HAPs for each such week.
2. The permittee shall submit pressure drop deviation (excursion) reports that identify that all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in section B.1 of these terms and conditions.
3. All deviation (excursion) reports shall be submitted in accordance with section 3.b of the General Terms and Conditions.
4. The permittee shall submit annual reports that summarize the emissions of OC, each single HAP, and combined HAPs from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010. The reports shall include the emission calculations, shall be submitted by February 15 of each year, and shall cover the previous calendar year.
5. The permittee shall also submit annual reports that summarize the emission factor determination. The reports shall include the calculations, shall be submitted by February 15 of each year, and shall cover the previous calendar year.

**E. Testing Requirements**

1. Compliance with the emission limitations in section A.1 of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:  
20% opacity as a 6-minute average

Applicable Compliance Method: Compliance with visible particulate emission limitations shall be determined in accordance with the test methods and procedures in OAC Rule 3745-17-03 (B)(1).

b. Emissions Limitation:  
3.4 lbs/hour of VOC

Applicable Compliance Method: Compliance shall be based upon the record keeping specified in section C.2 of these terms and conditions.

c. Emission Limitation:  
0.1 lb/hour of particulates

Applicable Compliance Method: Compliance shall be determined in accordance with the test methods and procedures in OAC rule 3745-17-03 (B)(10)(a), if required by Ohio EPA.

d. Emissions Limitation:  
0.44 ton/year of particulates

Applicable Compliance Method: The ton per year limitations were developed by multiplying the pound per hour limitations by the maximum operating schedule of 8760 hours per year. Therefore, provided compliance is shown with the hourly limitations, compliance will also be shown with the annual limitations.

e. Emission Limitation:  
3.36 tons/year of VOC

Applicable Compliance Method: Compliance shall be based upon the record keeping specified in section C.2 of these terms and conditions.

**E. Testing Requirements (continued)**

2. Compliance with the emission limitations in section A.2 of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

6.01 tons of methanol per year from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010, based upon rolling 52-week summations of the weekly emissions.

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section C.4 of these terms and conditions.

b. Emission Limitation:

9.03 tons of each single HAP per year from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010, based upon rolling 52-week summations of the weekly emissions.

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section C.4 of these terms and conditions.

c. Emission Limitation:

19.14 tons of combined HAPs per year from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010, based upon rolling 52-week summations of the weekly emissions.

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section C.4 of these terms and conditions.

d. Emissions Limitation:

40 lbs/day of OC

Applicable Compliance Method: Compliance shall be based upon the record keeping specified in section C.2 of these terms and conditions.

3. Formulation data shall be used to determine the HAP and organic compound contents of each material used in this emissions unit.

**F. Miscellaneous Requirements**

1. The permittee shall calculate an emission factor each year for organic compound emissions. The emission factor shall be calculated by January 5 of each year, and shall be based upon the previous calendar year's operation. During the first year of operation following the issuance of this permit, the permittee has proposed and shall use a maximum emission factor of 0.008 ton OC emissions per ton of solvent usage. Beginning after the first year operation following the issuance of this permit, the permittee shall use the calculated OC emission factor for each calendar year.
2. Pursuant to OAC rule 3745-35-07, the following sections of these terms and conditions are federally enforceable: A - F.



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

TELE: (614) 644-3020 FAX: (614) 644-2329

03/11/04

**CERTIFIED MAIL**

**RE: Final Chapter 3745-35 Permit To Operate**

**P009 (D009) 15 HP Hockmeyer**

Aexcel Corporation (02-43-08-1231)  
Lorie Webb  
7373 Production Drive  
Mentor, OH 44060

Dear Lorie Webb:

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action of the Director is final 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. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, Ohio 43215

If you have any questions, please contact Northeast District Office.

Sincerely,

Michael W. Ahern  
Permit Issuance and Data Management Section  
Division of Air Pollution Control

cc: Northeast District Office



State of Ohio Environmental Protection Agency

## Final Permit To Operate An Emissions Unit

Effective Date: 03/11/04

Expiration Date: 03/11/09

This document constitutes issuance to:

Facility ID: 02-43-08-1231  
Aexcel Corporation  
7373 Production Drive  
Mentor, OH 44060

of a permit to operate for:

P009 (D009)  
15 HP Hockmeyer

You will be contacted six months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency identified below. This permit and the authorization to operate the air contaminant source (emissions unit) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC Chapter 3745-35 and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your permit:

Northeast District Office  
2110 East Aurora Road  
Twinsburg, OH 44087  
(330) 425-9171

This permit is granted subject to the conditions attached hereto.

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones  
Director

## **Part I: General Terms and Conditions**

### **1 Compliance Requirements**

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

### **2. Permit to Install Requirement**

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

### **3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements**

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

### **4. Records Retention Requirements**

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Such records may be maintained in computerized form.

### **5. Inspections and Information Requests**

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State and federal air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this

permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

**6. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions unit or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of this emissions unit(s) that is (are) served by such control system(s).

**7. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permittee. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

**8. Air Pollution Nuisance**

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

**9. Permit Renewal**

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the following Ohio EPA District Office or local air agency which has jurisdiction in the area in which the facility is located:

Northeast District Office  
2110 East Aurora Road  
Twinsburg, OH 44087  
(330) 425-9171

It is the permittee's responsibility to renew this permit even if no notice of its expiration is received

**Part II: Special Terms and Conditions**

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Industrial Paint Dispenser System #9, consisting of a disperser, letdown tanks, and filling stations.	OAC rule 3745-17-07	Except as provided by rule, the permittee shall not cause or allow the discharge of visible particulate emissions into the ambient air from any stack associated with this emissions unit greater than twenty percent (20%) opacity, as a six-minute average. Visible particulate emissions may exceed 20% opacity as a six-minute average, for not more than six consecutive minutes in any sixty minutes, but shall not exceed sixty percent (60%) opacity, as a six-minute average, at any time.
	OAC rule 3745-17-11	The particulate emission limit based upon this applicable rule is less stringent than the limit established pursuant to OAC rule 3745-31-05.
	OAC rule 3745-21-07 (G)(2)	The hourly organic compounds (OC) limit based upon this applicable rule is less stringent than the limit established pursuant to OAC rule 3745-31-05.
	OAC rule 3745-31-05 PTI No. 02-8023	The daily OC limit based upon this applicable rule is less stringent than the limit established pursuant to OAC rule 3745-35-07. See section A.2.d of these terms and conditions. The permittee shall not exceed the following limits:
		a. 1.52 pounds per hour and 1.44 tons per year of VOC; and
		b. 0.1 pound per hour and 0.44 ton per year of particulates.
	OAC rule 3745-35-07	See section A.2.a and A.2.d of these terms and conditions.

## 2. Additional Terms and Conditions

- 2.a The methanol emission from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 shall not exceed 6.01 tons per year, based upon rolling 52-week summations of the weekly emissions.
- 2.b The emissions of each single hazardous air pollutant (HAP) from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 shall not exceed 9.03 tons per year, based upon rolling 52-week summations of the weekly emissions.
- 2.c The emissions of the combined HAPs from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 shall not exceed 19.14 tons per year, based upon rolling 52-week summations of the weekly emissions.
- 2.d The organic compound emissions from this emissions unit shall not exceed 36.48 pounds per day. This limit applies to every day of operation, including any day when photochemically reactive materials are not employed in this emissions unit.

## B. Operational Restrictions

- 1. The pressure drop across the baghouse shall be maintained within the range of 2 to 5 inches of water while the emissions unit is in operation.

## C. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall keep the following information each year to determine emission factor for this emissions unit:
  - a. The annual solvent usage, in tons per year, to be defined as "SU". "SU" shall include initial solvent loaded, adds in of off-spec product, and solvent used to wash down vessels,.
  - b. The solvent in production, in tons per year, to be defined as "SP". "SP" shall be calculated as follows:  
 $SP = PR * S\%$   
where,  
PR = the annual production rate, in tons per year.  
S% = the average percentage of solvent in products, by weight.
  - c. The waste solvent, in tons per year, to be defined as "WS".
  - d. The annual OC emissions, in tons per year, to be defined as "YOC". "YOC" shall be calculated as follows  
 $YOC = SU - SP - WS$
  - e. The annual emission factor for this emissions unit, "EF", in ton OC per ton of solvent used. "EF" shall be calculated as follows:  
 $EF = YOC / SU$

**C. Monitoring and/or Record Keeping Requirements (continued)**

2. To ensure compliance with the OC emission limits, the permittee shall keep following weekly records:
  - a Name or ID of each solvent used in this emissions unit
  - b Amount of each solvent used, "WS", in pounds per week. "WS" shall include the initial solvent loaded adds in off-spec product, and solvent used to wash down vessels.
  - c The total amount of solvent usage, "TWS", in pounds per week. "TWS" equals to the summation, from  $i = 1$  to  $i = n$ , of  $(WS)_i$ , where:  
 $i$  = subscript denoting a solvent, and  
 $n$  = the number of different solvents.
  - d The total operating days, "OD", in days per week
  - e The total operating hours, "OT", in hours per week
  - f The weekly OC emissions, "WOC", in pounds. "WOC" shall be calculated as follows:  
 $WOC = TWS * EF$   
where, EF = emission factor, pound OC per pound of solvent used. See section F.1 of these terms and conditions.
  - g The average daily OC emissions, "DOC", in pounds. "DOC" shall be calculated as follows:  
 $DOC = WOC / OD$
  - h The average hourly OC emissions, "HOC", in pounds. "HOC" shall be calculated as follows:  
 $HOC = WOC / OT$
  - i The rolling 52-week summations of OC emissions.
3. To ensure compliance with the HAP emission limits, the permittee shall keep following weekly records:
  - a Name or ID for each HAP employed in this emissions unit
  - b The amount of each single HAP employed, "MH", in pounds per week
  - c The weekly emissions of each single HAP from this emissions unit, "SHAP", in pounds. "SHAP" shall be calculated as follows:  
 $SHAPM = (MH / TWS) * WOC$   
where, "WOC" and "TWS" are recorded in section C.2 of these terms and conditions.
  - d The total amount of combined HAPs emitted from this emissions unit, in pounds per week, to be defined as "THAP". "THAP" equals to the summation, from  $i = 1$  to  $i = n$ , of  $(SHAP)_i$ , where  
 $i$  = subscript denoting a single HAP, and  
 $n$  = the number of different single HAPs.
4. The permittee shall keep the following rolling, 52-week summations, in tons, for this emissions unit and for emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 combined:
  - a the emissions of each single HAP; and
  - b the emissions of combined HAPs.
5. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on daily basis.

## **D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. An identification of each week during which the average OC emissions from this emissions unit exceeded 1.52 pounds per hour, and the actual average hourly OC emissions for each such week.
  - b. An identification of each week during which the average OC emissions from this emissions unit exceeded 36.48 pounds per day, and the actual average daily OC emissions for each such week.
  - c. An identification of each week during which the rolling, 52-week emissions of methanol from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 exceeded 6.01 tons per year, and the actual rolling, 52-week emissions of methanol for each such week.
  - d. An identification of each week during which the rolling, 52-week emissions of any single HAP, excluding methanol, from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 exceeded 9.03 tons per year, and the actual rolling, 52-week emissions of each such single HAP for each such week.
  - e. An identification of each week during which the rolling, 52-week emissions of combined HAPs from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 exceeded 19.14 tons per year, and the actual rolling, 52-week emissions of combined HAPs for each such week.
2. The permittee shall submit pressure drop deviation (excursion) reports that identify that all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in section B.1 of these terms and conditions.
3. All deviation (excursion) reports shall be submitted in accordance with section 3.b of the General Terms and Conditions.
4. The permittee shall submit annual reports that summarize the emissions of OC, each single HAP, and combined HAPs from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010. The reports shall include the emission calculations, shall be submitted by February 15 of each year, and shall cover the previous calendar year.
5. The permittee shall also submit annual reports that summarize the emission factor determination. The reports shall include the calculations, shall be submitted by February 15 of each year, and shall cover the previous calendar year.

**E. Testing Requirements**

1. Compliance with the emission limitations in section A.1 of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:  
20% opacity as a 6-minute average

Applicable Compliance Method: Compliance with visible particulate emission limitations shall be determined in accordance with the test methods and procedures in OAC Rule 3745-17-03 (B)(1).

b. Emissions Limitation:  
1.52 lbs/hour of VOC

Applicable Compliance Method: Compliance shall be based upon the record keeping specified in section C.2 of these terms and conditions.

c. Emission Limitation:  
0.1 lb/hour of particulates

Applicable Compliance Method: Compliance shall be determined in accordance with the test methods and procedures in OAC rule 3745-17-03 (B)(10)(a), if required by Ohio EPA.

d. Emissions Limitation:  
0.44 ton/year of particulates

Applicable Compliance Method: The ton per year limitations were developed by multiplying the pound per hour limitations by the maximum operating schedule of 8760 hours per year. Therefore, provided compliance is shown with the hourly limitations, compliance will also be shown with the annual limitations.

e. Emission Limitation:  
1.44 tons/year of VOC

Applicable Compliance Method: Compliance shall be based upon the record keeping specified in section C.2 of these terms and conditions.

**E. Testing Requirements (continued)**

2. Compliance with the emission limitations in section A.2 of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

6.01 tons of methanol per year from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010, based upon rolling 52-week summations of the weekly emissions.

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section C.4 of these terms and conditions.

b. Emission Limitation:

9.03 tons of each single HAP per year from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010, based upon rolling 52-week summations of the weekly emissions.

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section C.4 of these terms and conditions.

c. Emission Limitation:

19.14 tons of combined HAPs per year from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010, based upon rolling 52-week summations of the weekly emissions.

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section C.4 of these terms and conditions.

d. Emissions Limitation:

36.48 lbs/day of OC

Applicable Compliance Method: Compliance shall be based upon the record keeping specified in section C.2 of these terms and conditions.

3. Formulation data shall be used to determine the HAP and organic compound contents of each material used in this emissions unit.

**F. Miscellaneous Requirements**

1. The permittee shall calculate an emission factor each year for organic compound emissions. The emission factor shall be calculated by January 5 of each year, and shall be based upon the previous calendar year's operation. During the first year of operation following the issuance of this permit, the permittee has proposed and shall use a maximum emission factor of 0.008 ton OC emissions per ton of solvent usage. Beginning after the first year operation following the issuance of this permit, the permittee shall use the calculated OC emission factor for each calendar year.
2. Pursuant to OAC rule 3745-35-07, the following sections of these terms and conditions are federally enforceable: A - F.



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center  
122 S. Front Street  
Columbus, OH 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center  
P.O. Box 1049  
Columbus, OH 43216-1049

03/11/04

**CERTIFIED MAIL**

**RE: Final Chapter 3745-35 Permit To Operate**

**P010 (D010) 15 HP Hockmeyer**

Aexcel Corporation (02-43-08-1231)  
Lorie Webb  
7373 Production Drive  
Mentor, OH 44060

Dear Lorie Webb:

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action of the Director is final 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. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, Ohio 43215

If you have any questions, please contact Northeast District Office.

Sincerely,

Michael W. Ahern  
Permit Issuance and Data Management Section  
Division of Air Pollution Control

cc: Northeast District Office



State of Ohio Environmental Protection Agency

## Final Permit To Operate An Emissions Unit

Effective Date: 03/11/04

Expiration Date: 03/11/09

This document constitutes issuance to:

Facility ID: 02-43-08-1231  
Aexcel Corporation  
7373 Production Drive  
Mentor, OH 44060

of a permit to operate for:

P010 (D010)  
15 HP Hockmeyer

You will be contacted six months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency identified below. This permit and the authorization to operate the air contaminant source (emissions unit) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC Chapter 3745-35 and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your permit:

Northeast District Office  
2110 East Aurora Road  
Twinsburg, OH 44087  
(330) 425-9171

This permit is granted subject to the conditions attached hereto.

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones  
Director

## **Part I: General Terms and Conditions**

### **1 Compliance Requirements**

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

### **2. Permit to Install Requirement**

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

### **3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements**

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

### **4. Records Retention Requirements**

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Such records may be maintained in computerized form.

### **5. Inspections and Information Requests**

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State and federal air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine

whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

**6. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions unit or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of this emissions unit(s) that is (are) served by such control system(s).

**7. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permittee. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

**8. Air Pollution Nuisance**

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

**9. Permit Renewal**

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the following Ohio EPA District Office or local air agency which has jurisdiction in the area in which the facility is located:

Northeast District Office  
2110 East Aurora Road  
Twinsburg, OH 44087  
(330) 425-9171

It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

**Part II: Special Terms and Conditions**

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Industrial Paint Dispenser System #10, consisting of a dispenser, letdown tanks, and filling stations.	OAC rule 3745-17-07	Except as provided by rule, the permittee shall not cause or allow the discharge of visible particulate emissions into the ambient air from any stack associated with this emissions unit greater than twenty percent (20%) opacity, as a six-minute average. Visible particulate emissions may exceed 20% opacity as a six-minute average, for not more than six consecutive minutes in any sixty minutes, but shall not exceed sixty percent (60%) opacity, as a six-minute average, at any time.
	OAC rule 3745-17-11	The particulate emission limit based upon this applicable rule is less stringent than the limit established pursuant to OAC rule 3745-31-05.
	OAC rule 3745-21-07 (G)(2)	The hourly organic compounds (OC) limit based upon this applicable rule is less stringent than the limit established pursuant to OAC rule 3745-31-05.
	OAC rule 3745-31-05 PTI No. 02-4672	The daily OC limit based upon this applicable rule is less stringent than the limit established pursuant to OAC rule 3745-35-07. See section A.2.d of these terms and conditions. The permittee shall not exceed the following limits:
	OAC rule 3745-35-07	a. 1.55 pounds per hour and 1.44 tons per year of VOC; and b. 0.1 pound per hour and 0.44 ton per year of particulates.
	OAC rule 3745-35-07	See section A.2.a and A.2.d of these terms and conditions.

## 2. Additional Terms and Conditions

- 2.a The methanol emission from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 shall not exceed 6.01 tons per year, based upon rolling 52-week summations of the weekly emissions.
- 2.b The emissions of each single hazardous air pollutant (HAP) from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 shall not exceed 9.03 tons per year, based upon rolling 52-week summations of the weekly emissions.
- 2.c The emissions of the combined HAPs from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 shall not exceed 19.14 tons per year, based upon rolling 52-week summations of the weekly emissions.
- 2.d The organic compound emissions from this emissions unit shall not exceed 37.2 pounds per day. This limit applies to every day of operation, including any day when photochemically reactive materials are not employed in this emissions unit.

## B. Operational Restrictions

- 1. The pressure drop across the baghouse shall be maintained within the range of 2 to 5 inches of water while the emissions unit is in operation.

## C. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall keep the following information each year to determine emission factor for this emissions unit:
  - a. The annual solvent usage, in tons per year, to be defined as "SU". "SU" shall include initial solvent loaded, adds in of off-spec product, and solvent used to wash down vessels,.
  - b. The solvent in production, in tons per year, to be defined as "SP". "SP" shall be calculated as follows:  
 $SP = PR * S\%$   
where,  
PR = the annual production rate, in tons per year.  
S% = the average percentage of solvent in products, by weight.
  - c. The waste solvent, in tons per year, to be defined as "WS".
  - d. The annual OC emissions, in tons per year, to be defined as "YOC". "YOC" shall be calculated as follows:  
 $YOC = SU - SP - WS$
  - e. The annual emission factor for this emissions unit, "EF", in ton OC per ton of solvent used. "EF" shall be calculated as follows:  
 $EF = YOC / SU$

**C. Monitoring and/or Record Keeping Requirements (continued)**

2. To ensure compliance with the OC emission limits, the permittee shall keep following weekly records:
- a. Name or ID of each solvent used in this emissions unit.
  - b. Amount of each solvent used, "WS", in pounds per week. "WS" shall include the initial solvent loaded, adds in off-spec product, and solvent used to wash down vessels.
  - c. The total amount of solvent usage, "TWS", in pounds per week. "TWS" equals to the summation, from  $i = 1$  to  $i = n$ , of  $(WS)_i$ , where:  
 $i$  = subscript denoting a solvent, and  
 $n$  = the number of different solvents.
  - d. The total operating days, "OD", in days per week.
  - e. The total operating hours, "OT", in hours per week.
  - f. The weekly OC emissions, "WOC", in pounds. "WOC" shall be calculated as follows:  
 $WOC = TWS * EF$   
where, EF = emission factor, pound OC per pound of solvent used. See section F.1 of these terms and conditions.
  - g. The average daily OC emissions, "DOC", in pounds. "DOC" shall be calculated as follows:  
 $DOC = WOC / OD$
  - h. The average hourly OC emissions, "HOC", in pounds. "HOC" shall be calculated as follows:  
 $HOC = WOC / OT$
  - i. The rolling 52-week summations of OC emissions.
3. To ensure compliance with the HAP emission limits, the permittee shall keep following weekly records:
- a. Name or ID for each HAP employed in this emissions unit.
  - b. The amount of each single HAP employed, "MH", in pounds per week.
  - c. The weekly emissions of each single HAP from this emissions unit, "SHAP", in pounds. "SHAP" shall be calculated as follows:  
 $SHAPM = (MH / TWS) * WOC$   
where, "WOC" and "TWS" are as defined in section C.2 of these terms and conditions.
  - d. The total amount of combined HAPs emitted from this emissions unit, in pounds per week, to be defined as "THAP". "THAP" equals to the summation, from  $i = 1$  to  $i = n$ , of  $(SHAP)_i$ ,  
where  
 $i$  = subscript denoting a single HAP, and  
 $n$  = the number of different single HAPs.
4. The permittee shall keep the following rolling, 52-week summations, in tons, for this emissions unit and for emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 combined:
- a. the emissions of each single HAP; and
  - b. the emissions of combined HAPs.
5. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on daily basis.

#### **D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. An identification of each week during which the average OC emissions from this emissions unit exceeded 1.55 pounds per hour, and the actual average hourly OC emissions for each such week.
  - b. An identification of each week during which the average OC emissions from this emissions unit exceeded 37.2 pounds per day, and the actual average daily OC emissions for each such week.
  - c. An identification of each week during which the rolling, 52-week emissions of methanol from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 exceeded 6.01 tons per year, and the actual rolling, 52-week emissions of methanol for each such week.
  - d. An identification of each week during which the rolling, 52-week emissions of any single HAP, excluding methanol, from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 exceeded 9.03 tons per year, and the actual rolling, 52-week emissions of each such single HAP for each such week.
  - e. An identification of each week during which the rolling, 52-week emissions of combined HAPs from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010 exceeded 19.14 tons per year, and the actual rolling, 52-week emissions of combined HAPs for each such week.
2. The permittee shall submit pressure drop deviation (excursion) reports that identify that all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in section B.1 of these terms and conditions.
3. All deviation (excursion) reports shall be submitted in accordance with section 3.b of the General Terms and Conditions.
4. The permittee shall submit annual reports that summarize the emissions of OC, each single HAP, and combined HAPs from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010. The reports shall include the emission calculations, shall be submitted by February 15 of each year, and shall cover the previous calendar year.
5. The permittee shall also submit annual reports that summarize the emission factor determination. The reports shall include the calculations, shall be submitted by February 15 of each year, and shall cover the previous calendar year.

## E. Testing Requirements

1. Compliance with the emission limitations in section A.1 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:  
20% opacity as a 6-minute average

Applicable Compliance Method: Compliance with visible particulate emission limitations shall be determined in accordance with the test methods and procedures in OAC Rule 3745-17-03 (B)(1).

- b. Emissions Limitation:  
1.55 lbs/hour of VOC

Applicable Compliance Method: Compliance shall be based upon the record keeping specified in section C.2 of these terms and conditions.

- c. Emission Limitation:  
0.1 lb/hour of particulates

Applicable Compliance Method: Compliance shall be determined in accordance with the test methods and procedures in OAC rule 3745-17-03 (B)(10)(a), if required by Ohio EPA.

- d. Emissions Limitation:  
0.44 ton/year of particulates

Applicable Compliance Method: The ton per year limitations were developed by multiplying the pound per hour limitations by the maximum operating schedule of 8760 hours per year. Therefore, provided compliance is shown with the hourly limitations, compliance will also be shown with the annual limitations.

- e. Emission Limitation:  
1.44 tons/year of VOC

Applicable Compliance Method: Compliance shall be based upon the record keeping specified in section C.2 of these terms and conditions.

**E. Testing Requirements (continued)**

2. Compliance with the emission limitations in section A.2 of these terms and conditions shall be determined in accordance with the following methods:
  - a. **Emission Limitation:**  
6.01 tons of methanol per year from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010, based upon rolling 52-week summations of the weekly emissions.  
  
**Applicable Compliance Method:** Compliance shall be determined based upon the record keeping specified in section C.4 of these terms and conditions.
  - b. **Emission Limitation:**  
9.03 tons of each single HAP per year from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010, based upon rolling 52-week summations of the weekly emissions.  
  
**Applicable Compliance Method:** Compliance shall be determined based upon the record keeping specified in section C.4 of these terms and conditions.
  - c. **Emission Limitation:**  
19.14 tons of combined HAPs per year from emissions units P001, P002, P004, P005, P006, P007, P008, P009, and P010, based upon rolling 52-week summations of the weekly emissions.  
  
**Applicable Compliance Method:** Compliance shall be determined based upon the record keeping specified in section C.4 of these terms and conditions.
  - d. **Emissions Limitation:**  
37.2 lbs/day of OC  
  
**Applicable Compliance Method:** Compliance shall be based upon the record keeping specified in section C.2 of these terms and conditions.
3. Formulation data shall be used to determine the HAP and organic compound contents of each material used in this emissions unit.

**F. Miscellaneous Requirements**

1. The permittee shall calculate an emission factor each year for organic compound emissions. The emission factor shall be calculated by January 5 of each year, and shall be based upon the previous calendar year's operation. During the first year of operation following the issuance of this permit, the permittee has proposed and shall use a maximum emission factor of 0.008 ton OC emissions per ton of solvent usage. Beginning after the first year operation following the issuance of this permit, the permittee shall use the calculated OC emission factor for each calendar year.
2. Pursuant to OAC rule 3745-35-07, the following sections of these terms and conditions are federally enforceable: A - F.