

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

12/19/2013

Genevieve Damico *Via E-Mail Notification*
United States Environmental Protection Agency
Mail Code: AR-18J
77 West Jackson Blvd.
Chicago, IL 60604-3507

RE: PROPOSED AIR POLLUTION TITLE V PERMIT
Facility Name: PPG Industries, Inc. - Cleveland
Facility ID: 1318000101
Permit Type: Renewal
Permit Number: P0094207

Dear Ms. Damico:

A proposed OAC Chapter 3745-77 Title V permit for the referenced facility has been issued for review by U.S. EPA. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. If U.S. EPA does not object to this proposed permit, the permit will be processed for issuance as a final action not less than 45 days from the date of this letter. Please contact me at (614) 644-3631 by the end of the 45 day review period if you wish to object to the proposed permit.

Sincerely,


Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: Cleveland Division of Air Quality



PROPOSED

**Division of Air Pollution Control
Title V Permit
for
PPG Industries, Inc. - Cleveland**

Facility ID:	1318000101
Permit Number:	P0094207
Permit Type:	Renewal
Issued:	12/19/2013
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Title V Permit
for
PPG Industries, Inc. - Cleveland

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Authorization

Facility ID: 1318000101
Facility Description: Automotive coatings manufacturer.
Application Number(s): A0025686, A0025687
Permit Number: P0094207
Permit Description: Title V Renewal permit for PPG Industries, Inc. - Cleveland. PPG is a unique facility which groups pieces of equipment under three different "Emissions Units" as allowed per facility-specific OAC rule 3745-21-09(MM). K201 is Paint Laboratory Operations, P201 is Paint Manufacturing Operations, and P202 is Dedicated Waterbased Paint Production Equipment. K201 and P201 are both routed to a shared regenerative thermal oxidizer (RTO), and share a combined VOC emissions limit. This permit was made possible by the terms and conditions established in OAC rule 3745-21-09(MM). The previous TV PTO was issued final 2/12/2004 and PTI 13-03881 was modified and issued final 1/29/2009.
Permit Type: Renewal
Issue Date: 12/19/2013
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number: P0094206

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

PPG Industries, Inc. - Cleveland
3800 West 143rd Street
Cleveland, OH 44111

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

Cleveland Division of Air Quality
2nd Floor
75 ErieviewPlaza
Cleveland, OH 44114
(216)664-2297

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Cleveland Division of Air Quality. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months and no later than 6 months prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director



A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
- (1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions
 - (2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions
 - (3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting For State-Only Requirements
 - (4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (5) Standard Term and Condition A. 30.

(Authority for term: ORC 3704.036(A))

2. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
- (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) The operating conditions existing at the time of sampling or measurement.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))



c) The permittee shall submit required reports in the following manner:

- (1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any submitted scheduled maintenancerequests, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

- (2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the



probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be submitted promptly to the Cleveland Division of Air Quality. Except as provided below, the written reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

- (3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted to the Cleveland Division of Air Quality by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable



requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

- (4) Each written report shall be signed by a Responsible Official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete." Signature by the Responsible Official may be represented by entry of the personal identification number (PIN) by the Responsible Official as part of the electronic submission process or by the scanned attestation document signed by the Responsible Official that is attached to the electronically submitted written report.

(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

- (5) Consistent with A.2.c.1. above, reports of any required monitoring and/or record keeping information required to be submitted to Ohio EPA shall be submitted to Cleveland Division of Air Quality unless otherwise specified.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. Reporting of Any Exceedence of a Federally Enforceable Emission Limitation or Control Requirement Resulting From Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))



4. Risk Management Plans

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. § 7401 et seq. ("Act"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

- a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or
- b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

(Authority for term: OAC rule 3745-77-07(A)(4))

5. Title IV Provisions

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

(Authority for term: OAC rule 3745-77-07(A)(5))

6. Severability Clause

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

(Authority for term: OAC rule 3745-77-07(A)(6))

7. General Requirements

- a) Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit except as provided pursuant to A.16 below.
- c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.



- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.
- f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:
 - (1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or
 - (2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or
 - (3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminant sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

8. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

(Authority for term: OAC rule 3745-77-07(A)(8))

9. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

(Authority for term: OAC rule 3745-77-07(A)(9))



10. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.

(Authority for term: OAC rule 3745-77-07(A)(10))

11. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

- a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

12. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

(Authority for term: OAC rule 3745-77-07(B))

13. Compliance Requirements

- a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a Responsible



Official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

- b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c) The permittee shall submit progress reports to the Cleveland Division of Air Quality concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
- d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the Cleveland Division of Air Quality) and the Administrator of the U.S. EPA in the following manner and with the following content:
 - (1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
 - (2) Compliance certifications shall include the following:
 - a. Identification of each term or condition that is the basis of the certification. The identification may include a statement by the Responsible Official that every term and condition that is federally enforceable has been reviewed, and such terms and conditions with which there has been continuous compliance throughout the year are not separately identified.



- b. The permittee's current compliance status.
 - c. Whether compliance was continuous or intermittent consistent with A.13.d.2.a above.
 - d. The method(s) used for determining the compliance status of the source currently and over the required reporting period consistent with A.13.d.2.a above.
 - e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
- (3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

14. Permit Shield

- a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.
- b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

(Authority for term: OAC rule 3745-77-07(F))

15. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the Cleveland Division of Air Quality with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the Cleveland Division of Air Quality as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))



16. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

(Authority for term: OAC rule 3745-77-07(G))

17. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

- a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.
- b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.
- c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).
- d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.
- e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(Authority for term: OAC rule 3745-77-07(I))

18. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Federal Register 8314, Feb. 24, 1997), in the context of any future proceeding.

(This term is provided for informational purposes only.)



19. Insignificant Activities or Emissions Levels

Each IEU that is subject to one or more applicable requirements shall comply with those applicable requirements.

(Authority for term: OAC rule 3745-77-07(A)(1))

20. 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.

(Authority for term: OAC rule 3745-77-07(A)(1))

21. 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.

(Authority for term: OAC rule 3745-77-07(A)(1))

22. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the Responsible Official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the Responsible Official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

Unless otherwise exempted, no emissions unit identified in this permit that has been certified by the Responsible Official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-01)

23. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:



- a) Persons operating appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.
- b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.
- c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11))

24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or record keeping information shall be submitted to the Cleveland Division of Air Quality.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Cleveland Division of Air Quality. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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, 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.)

25. Records Retention Requirements Under State Law Only

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

26. Inspections and Information Requests

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



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

(Authority for term: OAC rule 3745-77-07(C))

27. Scheduled Maintenance/Malfunction Reporting For State-Only Requirements

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

28. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Cleveland Division of Air Quality must be notified in writing of any transfer of this permit.

(Authority for term: OAC rule 3745-77-01(C))

29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation 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 by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

- a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or
- b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potential to emit; or
- c) where the company's Responsible Official has certified that an emissions unit has been permanently shut down.

30. Submitting Documents Required by this Permit

All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air



Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the Cleveland Division of Air Quality, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the Responsible Official may be represented as provided through procedures established in Air Services.



B. Facility-Wide Terms and Conditions



1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - a) None.
2. Applicable Emissions Limitations and/or Control Requirements
 - a) Emissions from this facility shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table:

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
1.	OAC rule 3745-31-05(D) PTI P0114627	<p>Facility-wide volatile organic compounds (VOC) emissions shall not exceed 163.4 tons per year as a rolling, twelve-month summation.</p> <p>Facility-wide particulate emissions (PE) shall not exceed 14.4 tons per year as a rolling, twelve-month summation.</p> <p>Facility-wide sulfur dioxide (SO₂) emissions shall not exceed 35.8 tons per year as a rolling, twelve-month summation.</p> <p>Facility-wide nitrogen oxides (NO_x) emissions shall not exceed 64.0 tons per year as a rolling, twelve-month summation.</p> <p>Facility-wide carbon monoxide (CO) emissions shall not exceed 47.8 tons per year as a rolling, twelve-month summation.</p> <p>Facility-wide natural gas usage shall not exceed 1,079,230,000 cubic feet per year as rolling, twelve-month summation.</p> <p>Facility-wide distillate oil (number 1 and number 2 fuel oil, kerosene and diesel fuel, but excluding number 4 fuel oil) usage shall not exceed 1,000,000 gallons per year as rolling, twelve-month summation.</p> <p>See 2.b)(1) below.</p>



2.	40 CFR Part 63, Subpart HHHHH [In accordance with 40 CFR 63.7985 this unit is an existing miscellaneous coating manufacturing facility subject to the emissions limitations/control measures specified in this section.]	See 2.b)(2), c)(1), d)(4) and e)(5).
3.	40 CFR 63.1-16	Table 10 to 40 CFR, Part 63, Subpart HHHHH – Applicability of General Provisions to Subpart HHHHH shows which parts of the General Provisions in 40 CFR 63.1-16 apply.

b) Additional Terms and Conditions

- (1) The facility-wide rolling, twelve-month emission limitations for VOC, PE, SO₂, NO_x, and CO, and the facility-wide natural gas and distillate oil usage limitations established pursuant to OAC rule 3745-31-05(D) are synthetic minor limitations intended to restrict emission increases to less than the "significant" emission levels specified in OAC rule 3745-31-01 (i.e., less than 15 TPY for PE, less than 40 TPY for SO₂, less than 40 TPY for NO_x, less than 40 TPY for VOC, and less than 100 TPY for CO.)
- (2) The permittee is subject to the following MACT rule: Miscellaneous Coating Manufacturing, 40 CFR Part 63 Subpart HHHHH. The MACT Subpart HHHHH became effective on December 11, 2003. The requirements of this rule have been established in the Title V permit for this facility.
- (3) K201 – Paint Laboratory Operation equipment identified in Table 2 that meet the definition of “Research and development activity” per OAC rule 3745-31-01(IIII) are exempt from the MACT rule: Miscellaneous Coating Manufacturing, 40 CFR Part 63 Subpart HHHHH [reference 63.7985(d)(1)].

c) Operational Restrictions

- (1) The permittee shall comply with the applicable operational restrictions and requirements under 40 CFR, Part 63, Subpart HHHHH, including the following sections:

63.8000	General requirements
63.8005	Requirements for process vessels
63.8010	Requirements for storage tanks
63.8015	Requirements for equipment leaks
63.8020	Requirements for wastewater streams



63.8025	Requirements for transfer operations
63.8030	Requirements for heat exchange systems
63.8050	Alternative means of compliance for emissions averaging for stationary process vessels
63.8055	Alternative means of compliance for weight percent HAP limit
63.8095	Applicability of General Provisions to Subpart HHHHH

[Authority for term: OAC rule 3745-77-07(A)(1), MACT Subpart HHHHH, and PTI P0114627]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the rolling, twelve-month summation of the facility-wide VOC, PE, SO₂, NO_x, and CO emission rates, in tons. (Note: the permittee has existing records to demonstrate compliance with the rolling, twelve-month emission limitations upon issuance of this permit.)

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0114627]

- (2) The permittee shall maintain monthly records of the rolling, twelve-month summation of the facility-wide, monthly natural gas usages, in cubic feet (ft³). (Note: the permittee has existing records to demonstrate compliance with the rolling, twelve-month natural gas usage limitation upon issuance of this permit.)

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0114627]

- (3) The permittee shall maintain monthly records of the rolling, twelve-month summation of the facility-wide, monthly distillate oil usages, in gallons. (Note: the permittee has existing records to demonstrate compliance with the rolling, twelve-month distillate oil usage limitation upon issuance of this permit.)

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0114627]

- (4) The permittee shall comply with the applicable monitoring and record keeping requirements under 40 CFR, Part 63, Subpart HHHHH, including the following section:

63.8080	Required record keeping
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[Authority for term: OAC rule 3745-77-07(C)(1), MACT Subpart HHHHH, and PTI P0114627]



e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the facility-wide VOC, PE, SO₂, NO_x and CO emissions exceeded the limitations in 2.a).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0114627]

- (2) The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the facility-wide natural gas usage exceeded the limitation in 2.a).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0114627]

- (3) The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the facility-wide distillate oil usage exceeded the limitation in 2.a).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0114627]

- (4) The deviation reports shall be submitted in accordance with the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0114627]

- (5) The permittee shall comply with the applicable reporting requirements under 40 CFR, Part 63, Subpart HHHHH, including the following sections:

63.8070	Required notifications
63.8075	Required reports

[Authority for term: OAC rule 3745-77-07(C)(1), MACT Subpart HHHHH, and PTI P0114627]

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

- (1) Compliance with the emission limitations in 2.a) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:
Facility-wide VOC emissions shall not exceed 163.4 tons per year as a rolling, twelve-month summation.



Applicable Compliance Method:

The permittee shall calculate the facility-wide VOC emissions, on a monthly basis, as the summation of items i. through iv. below:

- i. multiply the facility-wide natural gas usage and the facility-wide distillate oil usage by the appropriate emission factors for VOC from USEPA's Compilation of Air Pollution Emission Factors, AP-42, Fifth Edition (If the AP-42 factors are revised, then PPG shall update emission factors through their renewal application) and convert the emission rates to tons;
- ii. for emissions units K201, P201, and P202, monthly VOC emissions shall be calculated as specified in Section C., 1.f), 2.f), and 3.f) of the terms and conditions for K201, P201, and P202;
- iii. for the insignificant emissions units (see reference Tables), the VOC emissions shall be calculated as follows:
 - (a) for the fuel burning units such as the Regenerative Thermal Oxidizer (RTO) burners, small boilers, heaters, hot water tanks, fire water pumps and backup generators, the VOC emissions are included in f)(1)a.i. above;
 - (b) for the solvent sinks, lab fume hoods, lab ovens, lab benches and draw scales, the VOC emissions are included in K201;
 - (c) for the drum agitation stations, centrifuges, dispense machines, overflow tanks, tank wagon rinsing and pigment pre-assembly, the VOC emissions are included in P201;
 - (d) for the storage tanks, USEPA's TANKS program shall be used to calculate the VOC emissions (If the TANKS program is revised, then PPG shall update emission calculations through their renewal application);
 - (e) for the Building 41 trash compactor, an emission rate of 0.18 pound of VOC per month shall be assumed based on engineering calculations supplied by the permittee; and
 - (f) for the uncontrolled paint spray booths, VOC emissions shall equal the entire organic content of the material sprayed;
 - (g) for the light liquid service pump seals and flanges (connectors) and external flanges, VOC emissions shall be determined using an emission factor of 0.000858 pound VOC per gallon of paint produced (this emission factor was developed by the permittee from 1996 calculated potential fugitive emissions of 8800 pounds VOC/10,254,474 gallons of paint produced; calculations are included in the facility Title V permit application file LDAR2.xls/sheet2.); and



- iv. the VOC emissions from any new emissions unit(s) may be determined using one or more of the following with Agency approval:
 - (a) USEPA's Compilation of Air Pollution Emission Factors, AP-42, Fifth Edition (If the AP-42 factors are revised, then PPG shall update emission factors through their renewal application), Section 5.2 Transportation and Marketing of Petroleum Liquids, (7/2008);
 - (b) USEPA's Compilation of Air Pollution Emission Factors, AP-42, Fifth Edition (If the AP-42 factors are revised, then PPG shall update emission factors through their renewal application), Section 6.4 Paint and Varnish, (5/1983);
 - (c) USEPA's Compilation of Air Pollution Emission Factors, AP-42, Fifth Edition (If the AP-42 factors are revised, then PPG shall update emission factors through their renewal application), Section 7.1 Organic Liquid Storage Tanks, (11/2006);
 - (d) USEPA emission estimation software programs such as TANKS program, SPECIATE version 3.1, Factor Information Retrieval (FIRE) version 6.22 (If the TANKS program and/or FIRE factors are revised, then PPG shall update emission calculations through their renewal application);
 - (e) USEPA's Control of Volatile Organic Compounds Emissions from Ink and Paint Manufacturing Processes, EPA-450/3-92-013, April 1992;
 - (f) USEPA's 1995 Protocol for Equipment Leak Emission Estimates, EPA-453/R-95-017, November 1995;
 - (g) stack test emission data;
 - (h) material balance calculations; or
 - (i) other Agency-approved emission factors.

The permittee shall calculate the rolling, twelve-month VOC emissions as the sum of the VOC emissions from the current calendar month and the previous 11 calendar months.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0114627]

- b. Emission Limitation:
Facility-wide PE shall not exceed 14.4 tons per year as a rolling, twelve-month summation.



Applicable Compliance Method:

The permittee shall calculate the facility-wide PE, on a monthly basis, as the summation of items i. through iv. below:

- i. multiply the facility-wide natural gas usage and the facility-wide distillate oil usage by the appropriate emission factors for PE from USEPA's Compilation of Air Pollution Emission Factors, AP-42, Fifth Edition (If the AP-42 factors are revised, then PPG shall update emission factors through their renewal application) and convert the emission rates to tons;
- ii. for emissions units K201 and P201, the PE rate shall be the annual PE rate, in tons per year, calculated in Section C.1.f), and C.2.f), of the terms and conditions for K201 and P201 divided by 12 months per year;
- iii. for the insignificant emissions units (see reference Tables in Appendix A), PE shall be calculated as follows:
 - (a) for the fuel burning units such as the RTO burners, small boilers, heaters, hot water tanks, fire water pumps and backup generators, the PE are included in f)(1)b.i. above; and
 - (b) for the uncontrolled paint spray booths, PE shall equal the entire solids content of the material sprayed.
- iv. the PE from any new emissions unit(s) may be determined using one of the following with Agency approval:
 - (a) USEPA's Compilation of Air Pollution Emission Factors, AP-42, Fifth Edition (If the AP-42 factors are revised, then PPG shall update emission factors through their renewal application), Section 6.4 Paint and Varnish, (5/83);
 - (b) USEPA's Control of Volatile Organic Compounds Emissions from Ink and Paint Manufacturing Processes EPA-450/3-92-013 April 1992;
 - (c) stack test emission data;
 - (d) material balance calculations; or
 - (e) other Agency-approved emission factors.

The permittee shall calculate the rolling, twelve-month PE as the sum of the PE from the current calendar month and the previous 11 calendar months.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0114627]



c. Emission Limitation:

Facility-wide SO₂ emissions shall not exceed 35.8 tons per year as a rolling, twelve-month summation.

Applicable Compliance Method:

The permittee shall calculate the facility-wide SO₂ emissions, on a monthly basis, as the summation of items i. through iii. below:

- i. multiply the facility-wide natural gas usage and the facility-wide distillate oil usage by the appropriate emission factors for SO₂ from USEPA's Compilation of Air Pollution Emission Factors, AP-42, Fifth Edition (If the AP-42 factors are revised, then PPG shall update emission factors through their renewal application) and convert the emission rates to tons;
- ii. for the fuel burning units such as the RTO burners, small boilers, heaters, hot water tanks, fire water pumps and backup generators, the SO₂ emissions are included in f)(1)c.i. above; and
- iii. SO₂ emissions from any new emissions unit(s) may be determined using one of the following with Agency approval:
 - (a) stack test emission data;
 - (b) material balance calculations; or
 - (c) other Agency-approved emission factors.

The permittee shall calculate the rolling, twelve-month SO₂ emissions as the sum of the SO₂ emissions from the current calendar month and the previous 11 calendar months.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0114627]

d. Emission Limitation:

Facility-wide NO_x emissions shall not exceed 64.0 tons per year as a rolling, twelve-month summation.

Applicable Compliance Method:

The permittee shall calculate the facility-wide NO_x emissions, on a monthly basis, as the summation of items i. through iii. below:

- i. multiply the facility-wide natural gas usage and the facility-wide distillate oil usage by the appropriate emission factors for NO_x from USEPA's Compilation of Air Pollution Emission Factors, AP-42, Fifth Edition (If the AP-42 factors are revised, then PPG shall update emission factors through their renewal application) and convert the emission rates to tons;
- ii. for the fuel burning units such as the RTO burners, small boilers, heaters, hot water tanks, fire water pumps and backup generators, the NO_x emissions are included in f)(1)d.i. above; and



- iii. NOx emissions from any new emissions unit(s) may be determined using one of the following with Agency approval:
 - (a) stack test emission data;
 - (b) material balance calculations; or
 - (c) other Agency-approved emission factors.

The permittee shall calculate the rolling, twelve-month NOx emissions as the sum of the NOx emissions from the current calendar month and the previous 11 calendar months.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0114627]

- e. Emission Limitation:
Facility-wide CO emissions shall not exceed 47.8 tons per year as a rolling, twelve-month summation.

Applicable Compliance Method:

The permittee shall calculate the facility-wide CO emissions, on a monthly basis, as the summation of items i. through iii. below:

- i. multiply the facility-wide natural gas usage and the facility-wide distillate oil usage by the appropriate emission factors for CO from USEPA's Compilation of Air Pollution Emission Factors, AP-42, Fifth Edition (If the AP-42 factors are revised, then PPG shall update emission factors through their renewal application) and convert the emission rates to tons;
- ii. for the fuel burning units such as the RTO burners, small boilers, heaters, hot water tanks, fire water pumps and backup generators, the CO emissions are included in f)(1)e.i. above; and
- iii. CO emissions from any new emissions unit(s) may be determined using one of the following with Agency approval:
 - (a) stack test emission data;
 - (b) material balance calculations; or
 - (c) other Agency-approved emission factors.

The permittee shall calculate the rolling, twelve-month CO emissions as the sum of the CO emissions from the current calendar month and the previous 11 calendar months.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0114627]

- g) Miscellaneous Requirements

- (1) This permit includes the following tables:



- Table 1 Non-Insignificant Emissions Units [emissions units under PTI P0114627]
- Table 2 K201 - Paint Laboratory Operations Emissions Units [emissions units grouped pursuant to OAC rule 3745-21-09(MM)(3)]
- Table 3 P201 - Paint Manufacturing Operations Emissions Units [emissions units grouped pursuant to OAC rule 3745-21-09(MM)(2)]
- Table 4 P202 - Dedicated Water Based Paint Production Equipment [emissions units grouped pursuant to OAC rule 3745-21-09(MM)(4)]

[Authority for term: PTI P0114627]

- (2) PPG Industries permit to install no. P0114627 contains terms and conditions, including best available technology requirements pursuant to OAC Rule 3745-31-05(A)(3) for all currently existing emissions units that are required to obtain a permit to install, and a list of all insignificant emissions units at this facility. The PTI will typically be modified whenever PPG Industries applies for a permit to either modify existing emissions units or to install new emissions units at this facility. This Title V permit will be modified accordingly to reflect changes made to the permit to install PTI 13-03881. Note that due to the functionality of the STARS2 program that is used to process and issue permits, a new permit number will be assigned each time PTI 13-03881 is modified. Regardless of the permit number change, the changes will be occurring within the same PTI.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0114627]

- (3) As per OAC rule 3745-31-02, PPG Industries shall apply for and obtain an air pollution permit to install prior to beginning construction of any non-exempt new or modified air contaminant source (emissions unit). Once PPG Industries has submitted a permit application for any such new or modified source, Ohio EPA will determine if either (a) a separate permit to install will be issued, or (b) permit to install no. P0114627 will be revised. This Title V permit will be modified or renewed in accordance with OAC Chapter 3745-77 to reflect such changes made to the permit to install.

[Authority for term: PTI P0114627]

- (4) The permittee shall submit updated Emissions Unit Tables 2, 3, and 4 to the Cleveland DAQ on an annual basis. The updated tables shall include a complete list of emissions units for each table (including an identification of all emissions unit(s) that is/are permanently shut down and dismantled) as of the end of the calendar year. This report shall be submitted to the Cleveland DAQ by February 28 of each year.

The updated Emissions Unit Tables 2, 3, and 4 will be included in each modification of the PTI. If none of the Emissions Unit Tables 2, 3, or 4 requires an update, the permittee shall submit a report by February 28 of each year that states no revisions are required. This Title V permit will be modified or renewed in accordance with OAC Chapter 3745-77 to reflect changes made to PTI P0114627.

[Authority for term: PTI P0114627]



- (5) The terms and conditions of this Title V permit hereby incorporate all the applicable requirements derived from PTIs, including emission limitations/control measures, established pursuant to OAC rule 3745-31-05(A)(3) (Best Available Technology) as specified in the permit to install P0114627.

[Authority for term: PTI P0114627]



C. Emissions Unit Terms and Conditions



1. K201, Paint Laboratory Operations

Operations, Property and/or Equipment Description:

Paint laboratory operations, controlled by a water curtain or dry filtration system located upstream of four rotary concentrator wheels and a regenerative thermal oxidizer (RTO).

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) d)(2), d)(10), d)(11), and d)(12).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) PTI P0114627	<p>Volatile organic compounds (VOC) emissions shall not exceed 145.0 tons per year as a rolling, twelve-month summation for K201 and P201 combined.</p> <p>Particulate emissions (PE) shall not exceed 0.3 pound per hour* and 1.2 tons per year as a rolling, twelve-month summation*.</p> <p>*These emission limitations are based on the emissions unit's potential to emit, with controls. Therefore, no record keeping and/or reporting requirements are necessary to ensure compliance with these emission limitations.</p> <p>Visible PE from the concentrator/RTO stack shall not exceed 5% opacity, as a 6-minute average.</p> <p>There shall be no visible fugitive PE from this emissions unit.</p> <p>Natural gas combustion emissions from the burners serving the RTO shall not exceed:</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>0.07 lb VOC/hr*; 0.02 lb PE/hr*; 0.01 lb SO₂/hr*; 1.20 lbsNO_x/hr*; and 1.01 lbs CO/hr*.</p> <p>*This lbs/hr emission limitation is based on the emissions unit's potential to emit. Therefore, no record keeping and/or reporting requirements are necessary to ensure compliance with this emission limitation.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(MM)(3).</p>
b.	OAC rule 3745-21-09(MM)(3)	See b)(2)c. and b)(2)d. below.
c.	OAC rule 3745-17-07(A)(1)	The visible emission limitation specified by this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
d.	OAC rule 3745-17-11(B)	The hourly emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
e.	40 CFR Part 63, Subpart HHHHH	The permittee shall comply with the applicable requirements of 40 CFR Part 63, Subpart HHHHH (National Emission Standards for Hazardous Air Pollutants: Miscellaneous Coating Manufacturing) as specified in Section B.

(2) Additional Terms and Conditions

- a. This emissions unit is considered to be "in operation" at any time during which any emissions unit(s) identified in Table 2: Paint Laboratory Operations Emissions Units is in operation.
- b. The permittee shall vent all of the PE to a water curtain system or dry filtration system at all times when this emissions unit is in operation.



- c. Except as otherwise provided in paragraph (MM)(4) of OAC rule 3745-21-09 (See b)(2)d. below), the VOC emissions from the equipment included within the paint laboratory operations shall be vented to a control system that shall achieve a minimum control efficiency of 90.0 percent by weight for the VOC emissions or a maximum outlet VOC concentration of twenty parts per million by volume dry basis.
- d. The requirements of OAC rule 3745-21-09 (MM)(3) shall not apply to any specific piece of equipment included within the paint laboratory operations during the processing or use of a waterbased paint material in said equipment, provided the following three conditions are met:
 - i. the equipment is dedicated solely to the production of waterbased paint materials;
 - ii. the VOC content of each waterbased paint material is less than or equal to 12.0 percent VOC by weight as determined under paragraph (B) of OAC rule 3745-21-10; and
 - iii. any VOC emissions from the processing or use of the waterbased paint materials that are not vented to the control systems specified in paragraph (MM)(3) of OAC rule 3745-21-09(MM) are included (accounted for) in a permit to install issued by the Director after August 22, 1990 pursuant to OAC Chapter 3745-31. These permits to install are identified in Table A: List of Permits of Install Issued to PPG Industries Ohio, Inc., Cleveland, Ohio.
- e. K201 – Paint Laboratory Operation equipment identified in Table 2 that meet the definition of “Research and development activity” per OAC rule 3745-31-01(IIII) are exempt from the MACT rule: Miscellaneous Coating Manufacturing, 40 CFR Part 63 Subpart HHHHH [reference 63.7985(d)(1)].

c) Operational Restrictions

- (1) The average combustion temperature within the RTO, for any 3-hour block of time (eight 3-hour blocks per day) when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emissions test that demonstrated that the emissions unit was in compliance.

[Authority for term: OAC rule 3745-77-07(A)(1), OAC 3745-21-09(B)(4)(b), and PTI P0114627]

- (2) The permittee shall operate a water curtain system or dry filtration system at all times when the associated paint laboratory operation is in operation.

(Spray booths are utilized to coat metal panels for automotive coating quality control/assurance and product development.

The spray booths are located within laboratory rooms segregated from office areas by doors and a hallway within the plant multi-floor building. The doors to the lab areas



remain closed at all times. The entire building is equipped with an environmental air handling system to maintain temperature and humidity to meet proper spraying specifications. As such, the building is equipped with sealed casement windows that may not be opened to the outside. Beyond the labs and office areas, secondary means of egress are provided into the building at ground level.

Each spray booth in the lab, under induced draft ventilation, is equipped with either a water curtain or a dry filter system to control overspray particulate emissions. The air stream from each spray booth is vented and controlled by the concentrator/RTO system. The spray booth is engineered and designed to trap paint overspray from the coating of the panels. If insufficient capture exists during the spraying, the operation is immediately discontinued.)

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI P0114627]

- (3) The permittee shall burn only natural gas in the burners serving the RTO controlling this emissions unit.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI P0114627]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall operate and maintain continuous temperature monitors and recorders which measure and record the combustion temperature within the RTO when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information for each day:

- a. all 3-hour blocks of time (eight 3-hour blocks per day) during which the average combustion temperature within the RTO, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature maintained during the most recent emissions test that demonstrated the emissions unit to be in compliance; and
- b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment when the associated emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC 3745-21-09(B)(4)(b), and PTI P0114627]

- (2) The permittee shall continue to operate its automated concentrator monitoring system with corresponding alarm systems, to ensure proper operation of the concentrator.

[Authority for term: OAC rule 3745-77-07(B)(2)]

- (3) For any specific equipment included within the paint laboratory operations, for which the permittee claims an exemption from the requirements of paragraph (MM)(3) of OAC rule



3745-21-09, pursuant to paragraph (MM)(4) of OAC rule 3745-21-09, the permittee shall keep daily records of the periods of time during which there is no laboratory activity at said equipment.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0114627]

- (4) The permittee shall maintain daily records that document any time periods when a water curtain system or dry filtration system was not in service when the associated paint laboratory operation was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0114627]

- (5) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the concentrator/RTO stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the color of the emissions;
- b. the total duration of any visible emission incident; and
- c. any corrective actions taken to eliminate the visible emissions.

If the weekly checks show no visible emissions for 12 consecutive weeks, the required frequency of visible emissions checks may be reduced to monthly (once per month, when the emissions unit is in operation). If a subsequent check indicates visible emissions, the frequency of visible emissions checks shall revert to weekly until such time as there are 12 consecutive weeks of no visible emissions.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0114627]

- (6) For each day during which the permittee burns a fuel other than natural gas in the burners serving the RTO controlling this emissions unit, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0114627]

- (7) The permittee shall keep monthly records of the operating hours (on line time) and the downtime (off line time) of the concentrator/RTO system while the emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0114627]

- (8) The permittee shall keep monthly records of the hours of operation of this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0114627]



- (9) The permittee shall maintain monthly records of the rolling, twelve-month VOC emissions, in tons for K201 and P201 combined.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0114627]

- (10) Air Toxic Policy Clarifying Language

The permit to install for this emissions unit (K201) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

- a. Pollutant: **Xylene**
TLV (mg/m³): 434.233
Maximum Hourly Emission Rate (pounds/hour): 33.11
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 61.56
MAGLC (ug/m³): 10,339
- b. Pollutant: **N-butyl Acetate**
TLV (mg/m³): 712.638
Maximum Hourly Emission Rate (pounds/hour): 33.11
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 61.56
MAGLC (ug/m³): 16,968
- c. Pollutant: **Methyl ethyl ketone**
TLV (mg/m³): 589.851
Maximum Hourly Emission Rate (pounds/hour): 33.11
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 61.56
MAGLC (ug/m³): 14,044
- d. Pollutant: **Di-isobutyl ketone**
TLV (mg/m³): 145.440
Maximum Hourly Emission Rate (pounds/hour): 33.11
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 61.56
MAGLC (ug/m³): 3,463
- e. Pollutant: **Ethanol**
TLV (mg/m³): 1,884.254
Maximum Hourly Emission Rate (pounds/hour): 33.11
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 61.56
MAGLC (ug/m³): 44,863



- f. Pollutant: **Methyl isobutyl ketone**
TLV (mg/m3): 204.826
Maximum Hourly Emission Rate (pounds/hour): 33.11
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 61.56
MAGLC (ug/m3): 4,877
- g. Pollutant: **Methanol**
TLV (mg/m3): 262.09
Maximum Hourly Emission Rate (pounds/hour): 33.11
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 61.56
MAGLC (ug/m3): 6,240.24

[Authority for term: OAC rule 3745-77-07(B)(2) and PTI P0114627]

- (11) Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

[Authority for term: OAC rule 3745-77-07(B)(2) and PTI P0114627]

- (12) If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.



The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the “Air Toxic Policy”:

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the “Air Toxic Policy”; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the “Air Toxic Policy” for the change.

[Authority for term: OAC rule 3745-77-07(B)(2) and PTI P0114627]

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in the burners serving the RTO controlling this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0114627]

- (2) The permittee shall notify the Cleveland DAQ in writing of any record showing that a water curtain system or dry filtration system was not in service when the associated paint laboratory operation was in operation. The notification shall include a copy of such record and shall be sent to the Cleveland DAQ within 30 days after the event occurs.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0114627]

- (3) The permittee shall submit quarterly temperature deviation (excursion) reports that identify all 3-hour blocks of time (eight 3-hour blocks per day), when the emissions unit was in operation, during which

- a. the average combustion temperature within the RTO was more than 50 degrees Fahrenheit below the average temperature during the most recent emissions test that demonstrated the emissions unit was in compliance.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC 3745-21-09(B)(4)(c), and PTI P0114627]

- (4) The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the VOC emission rate exceeded the limitation in b)(1).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0114627]

- (5) Except as otherwise provided in paragraph (MM)(4) of OAC rule 3745-21-09 (see b)(2)d.), the permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the concentrator/RTO system was not in service when the emissions unit was in operation.



[Authority for term: OAC rule 3745-21-09(MM)(4), OAC rule 3745-77-07(C)(1) and PTI P0114627]

- (6) The quarterly deviation (excursion) reports shall be submitted in accordance with the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0114627]

- (7) The permittee shall submit semiannual written reports that (a) identify all days during which any visible PE were observed from the concentrator/RTO stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible PE. These reports shall be submitted to the Cleveland DAQ by January 31 and July 31 of each year and shall cover the previous six-month period.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0114627]

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

VOC emissions shall not exceed 145.0 tons per year as a rolling, twelve-month summation for K201 and P201 combined.

Applicable Compliance Method:

The permittee shall calculate the combined monthly VOC emissions from K201 and P201 as follows:

Controlled monthly emissions = "on line" hours/month of the concentrator/RTO system recorded in d)(6) X 7.1 pounds VOC/hour* X 1 ton/2000 pounds

Uncontrolled monthly emissions = "off line" hours/month of the concentrator/RTO system recorded in d)(6) X 78.7 pounds VOC/hour* X 1 ton/2000 pounds

Total monthly actual emissions = Controlled monthly emissions + Uncontrolled monthly emissions

The permittee shall calculate the rolling, twelve-month VOC emissions as the sum of the VOC emissions from the current calendar month and the previous 11 calendar months.



* The emission factors are based upon testing conducted in September 2008 for K201 and P201. The factors are the additive average inlet VOC emission rate of 35.8 pounds/hour for K201 and 42.9 pounds/hour for P201 and the average outlet VOC emission rate of 7.14 pounds/hour for the K201 and P201 exhaust stack. The permittee shall use the emission factors from the most recent emissions test that demonstrated the emissions unit was in compliance for purposes of this calculation.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0114627]

b. Emission Limitations:

Particulate emissions (PE) shall not exceed 0.3 pound per hour and 1.2 tons per year as a rolling, twelve-month summation.

Applicable Compliance Method:

The PE limitations were established as follows:

$E = \text{Maximum coating solids usage rate (in pounds per hour)} \times (1 - TE) \times (1 - CE);$

Where:

$E = \text{Actual worst case PE rate, in pounds per hour}$

Maximum coating solids usage rate for all 82 spray booths = $(21,550 \text{ gals paint/yr} \times 6.5 \text{ lbs PE/gal}) / (8760 \text{ hrs/yr}) = 15.99 \text{ lbs PE/hr}$

TE = Transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used, expressed as a fraction (0.65)

CE = Control efficiency of the PE control equipment, expressed as a fraction (0.95)

Using the above equation, $E = 0.3 \text{ lb PE/hr}$

Annual PE is estimated as: $0.3 \text{ lb PE/hr} \times (8760 \text{ hrs/yr}) / (2000 \text{ lbs/ton}) = 1.2 \text{ tons PE per year.}$

Therefore, the permittee may assume an emission rate from this emissions unit of 1.2 tons PE per year as a rolling, twelve-month summation.

If required, the permittee shall demonstrate compliance with applicable emission limitations through emission testing performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 5.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0114627]



c. Emission Limitation:

Visible PE from the concentrator/RTO stack shall not exceed 5% opacity, as a 6-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0114627]

d. Emission Limitation:

There shall be no visible fugitive PE from this emissions unit.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 22.

Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0114627]

e. Emission Limitation:

A minimum control efficiency of 90.0 percent by weight for VOC emissions or a maximum outlet VOC concentration of twenty parts per million by volume dry basis.

Applicable Compliance Method:

If required, compliance with the emissions limitation shall be determined in accordance with U.S. EPA Reference Methods 1-4 and 18, 25 or 25A, as applicable, of 40 CFR Part 60, Appendix A.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0114627]

(2) 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 5 years of the date of the most recent compliance test. The most recent compliance test was performed on 11/5/2013. If necessary, testing may be performed beyond the five-year window provided approval is granted by the Cleveland DAQ.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable concentration of VOC in the exhaust stream or overall control efficiency limitation for VOC.



- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):
 - i. Methods 1-4 of 40 CFR Part 60 and;
 - ii. Method 18, 25 or 25 A, as applicable, of 40 CFR Part 60

Concurrent visible emissions observations at the concentrator/RTO stack shall be conducted during the emission testing in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

- d. The test(s) shall be conducted in accordance with applicable provisions in OAC rule 3745-21-10 and 40 CFR Part 63 Subparts A, SS, and HHHHH. The test(s) shall be conducted while the emission unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Cleveland Division of Air Quality.
- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Cleveland DAQ. 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 Cleveland DAQ's refusal to accept the results of the emission test(s).
- f. Personnel from the Cleveland DAQ 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.
- g. 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 Cleveland DAQ 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 Cleveland DAQ.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0114627]



g) Miscellaneous Requirements

(1) None.



2. P201, Paint Manufacturing Operations

Operations, Property and/or Equipment Description:

Paint manufacturing operations, controlled by four rotary concentrator wheels and a regenerative thermal oxidizer (RTO), two stand-alone primary dust collectors (600-DC-1 baghouse and 52-DC-1 baghouse), and three dust collectors: 9-DC-1 baghouse, 19-DC-1 baghouse, and 21-DC-1 baghouse. P201 is located upstream of the four rotary concentrator wheels and a RTO.

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) d)(2), d)(11), d)(12), d)(13) and d)(14)..

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) PTI P0114627	<p>Volatile organic compounds (VOC) emissions shall not exceed 145.0 tons per year as a rolling, twelve-month summation for K201 and P201 combined.</p> <p>Particulate emissions (PE) (stack and fugitive combined) shall not exceed 1.4 pounds per hour* and 6.0 tons per year as a rolling, twelve-month summation*.</p> <p>*These emission limitations are based on the emissions unit's potential to emit, with controls. Therefore, no record keeping and/or reporting requirements are necessary to ensure compliance with these emission limitations.</p> <p>Visible PE from the concentrator RTO stack shall not exceed 5% opacity, as a 6-minute average.</p> <p>Visible PE from the primary dust collector (600-DC-1 baghouse and 52-DC-1 baghouse) stack shall not exceed 5% opacity, as a 6-minute average.</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>Visible fugitive PE shall not exceed 5% opacity, as a 3-minute average.</p> <p>Natural gas combustion emissions from the burners serving the RTO shall not exceed:</p> <p>0.07 lb VOC/hr*; 0.02 lb PE/hr*; 0.01 lb SO₂/hr*; 1.20 lbsNO_x/hr*; and 1.01 lbs CO/hr*.</p> <p>* This lbs/hr emission limitation is based on the emissions unit's potential to emit. Therefore, no record keeping and/or reporting requirements are necessary to ensure compliance with this emission limitation.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(MM)(2) and 3745-17-08(B).</p>
b.	OAC rule 3745-21-09(MM)(2)	See b)(2)d. and b)(2)e. below.
c.	OAC rule 3745-17-07(A)(1)	The visible emission limitation specified by this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
d.	OAC rule 3745-17-11(B)	The hourly emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
e.	OAC rule 3745-17-07(B)(1)	The visible emission limitation specified by this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
f.	OAC rule 3745-17-08(B)	See b)(2)b. below.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
g.	40 CFR Part 63, Subpart HHHHH	The permittee shall comply with the applicable requirements of 40 CFR Part 63, Subpart HHHHH (National Emission Standards for Hazardous Air Pollutants: Miscellaneous Coating Manufacturing) as specified in Section B.

(2) Additional Terms and Conditions

- a. This emissions unit is considered to be "in operation" at any time during which any emissions unit(s) identified in Table 3: Paint Manufacturing Operations Emissions Units is in operation.
- b. The permittee shall ensure that the dust collectors are operated with sufficient air volume to minimize or eliminate visible fugitive PE at the points of capture to the extent possible with good engineering design.
- c. The permittee shall vent the PE from the paint manufacturing equipment listed below to the corresponding control device(s):
 - i. 9-M-1 Mixer, 9-M-6 Mixer, and 9-M-7 Mixer controlled by 9-DC-1 Baghouse which is exhausted to concentrator/RTO system;
 - ii. 19-M-01 Mixer, 19-M-02 Mixer, 19-M-03 Mixer, 19-M-04 Mixer, 19-M-05 Mixer, 19-M-06 Mixer, 19-M-08 Mixer, 19-M-09 Mixer, 19-M-10 Mixer, 19-M-11 Mixer, and 19-M-12 Mixer controlled by 19-DC-1 Baghouse which is exhausted to concentrator/RTO system;
 - iii. 21-M-01 Mixer controlled by 21-DC-1 Baghouse which is exhausted to concentrator/RTO system;
 - iv. Blend tanks 52-T-901 through 52-T-915, Milling tanks 52-T-940 through 52-T-945, and Premix tanks 52-T-920 through 52-T-927 shall be controlled by the stand-alone dust collector 52-DC-1 baghouse; and
 - v. 600-PA-1 Pigment Assembly controlled by a stand-alone primary dust collector 600-DC-1 Baghouse.
- d. Except as otherwise provided in paragraph (MM)(4) of OAC rule 3745-21-09 (See b)(2)e. below), the VOC emissions from the equipment included within the paint manufacturing operations shall be vented either directly or by means of a building or local area exhaust to a control system that shall maintain compliance with any of the following requirements:



- i. a minimum control efficiency of 98.0 percent by weight for the VOC emissions;
 - ii. a maximum outlet VOC concentration of twenty parts per million by volume dry basis; or
 - iii. a minimum incineration temperature of one thousand five hundred degrees Fahrenheit.
 - e. The requirements of OAC rule 3745-21-09 (MM)(2) shall not apply to any specific piece of equipment included within the paint manufacturing operations during the processing or use of a waterbased paint material in said equipment, provided the following three conditions are met:
 - i. the equipment is dedicated solely to the production of waterbased paint materials;
 - ii. the VOC content of each waterbased paint material is less than or equal to 12.0 percent VOC by weight as determined under paragraph (B) of OAC rule 3745-21-10; and
 - iii. any VOC emissions from the processing or use of the waterbased paint materials that are not vented to the control systems specified in paragraph (MM)(2) of OAC rule 3745-21-09(MM) are included (accounted for) in a permit to install issued by the Director after August 22, 1990 pursuant to OAC Chapter 3745-31. These permits to install are identified in Table A: List of Permits to Install Issued to PPG Industries Ohio, Inc., Cleveland, Ohio.
- c) Operational Restrictions
 - (1) The average combustion temperature within the RTO, for any 3-hour block of time (eight 3-hour blocks per day) when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emissions test that demonstrated that the emissions unit was in compliance.

[Authority for term: OAC rule 3745-77-07(A)(1), OAC 3745-21-09(B)(4)(b), and PTI P0114627]
 - (2) Any mixing or blending tank containing a paint material shall be equipped with a cover or lid that completely covers the opening of the tank, except for an opening no larger than necessary to allow for safe clearance for the mixer's shaft. Such tank shall be covered at all times in which the tank contains a paint material except when operator access is necessary to add ingredients or take samples.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI P0114627]
 - (3) The permittee shall operate the PE control device(s) at all times when this emissions unit is in operation and pigment is being blended.



[Authority for term: OAC rule 3745-77-07(A)(1) and PTI P0114627]

- (4) The permittee shall burn only natural gas in the burners serving the RTO controlling this emissions unit.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI P0114627]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall operate and maintain continuous temperature monitors and recorders which measure and record the combustion temperature within the RTO when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information for each day:

- a. all 3-hour blocks of time (eight 3-hour blocks per day) during which the average combustion temperature within the RTO, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature maintained during the most recent emissions test that demonstrated the emissions unit to be in compliance; and
- b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment when the associated emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)), OAC 3745-21-09(B)(4)(b), and PTI and P0114627]

- (2) The permittee shall continue to operate its automated concentrator monitoring system with corresponding alarm systems, to ensure proper operation of the concentrator.

[Authority for term: OAC rule 3745-77-07(B)(2)]

- (3) For any specific equipment included within the paint manufacturing operations, for which the permittee claims an exemption from the requirements of paragraph (MM)(2) of OAC rule 3745-21-09, pursuant to paragraph (MM)(4) of OAC rule 3745-21-09, the permittee shall keep daily records of the periods of time during which there is no activity at said equipment.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0114627]

- (4) The permittee shall maintain daily records that document any time periods when the PE control device(s) were not in service when the emissions unit was in operation and pigment was being blended.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0114627]

- (5) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the



concentrator/RTO stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the color of the emissions;
- b. the total duration of any visible emission incident; and
- c. any corrective actions taken to eliminate the visible emissions.

If the weekly checks show no visible emissions for 12 consecutive weeks, the required frequency of visible emissions checks may be reduced to monthly (once per month, when the emissions unit is in operation). If a subsequent check indicates visible emissions, the frequency of visible emissions checks shall revert to weekly until such time as there are 12 consecutive weeks of no visible emissions.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0114627]

- (6) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the primary dust collectors, 600-DC-1 and 52-DC-1, stacks serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the color of the emissions;
- b. the total duration of any visible emission incident; and
- c. any corrective actions taken to eliminate the visible emissions.

If the weekly checks show no visible emissions for 12 consecutive weeks, the required frequency of visible emissions checks may be reduced to monthly (once per month, when the emissions unit is in operation). If a subsequent check indicates visible emissions, the frequency of visible emissions checks shall revert to weekly until such time as there are 12 consecutive weeks of no visible emissions.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0114627]

- (7) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the color of the emissions;
- b. the total duration of any visible emission incident; and
- c. any corrective actions taken to eliminate the visible emissions.



If the weekly checks show no visible emissions for 12 consecutive weeks, the required frequency of visible emissions checks may be reduced to monthly (once per month, when the emissions unit is in operation). If a subsequent check indicates visible emissions, the frequency of visible emissions checks shall revert to weekly until such time as there are 12 consecutive weeks of no visible emissions.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0114627]

- (8) The permittee shall maintain monthly records of the operating hours (on line time) and the downtime (off line time) of the concentrator/RTO system while the emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0114627]

- (9) The permittee shall maintain monthly records of the hours of operation of this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0114627]

- (10) The permittee shall maintain monthly records of the rolling, twelve-month VOC emissions, in tons, for K201 and P201 combined.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0114627]

- (11) Air Toxic Policy Clarifying Language

The permit to install for this emissions unit (P201) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

- a. Pollutant: **Xylene**
TLV (mg/m³): 434.233
Maximum Hourly Emission Rate (pounds/hour): 33.11
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 61.56
MAGLC (ug/m³): 10,339
- b. Pollutant: **N-butyl Acetate**
TLV (mg/m³): 712.638
Maximum Hourly Emission Rate (pounds/hour): 33.11
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 61.56
MAGLC (ug/m³): 16,968



- c. Pollutant: **Methyl ethyl ketone**
TLV (mg/m³): 589.851
Maximum Hourly Emission Rate (pounds/hour): 33.11
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 61.56
MAGLC (ug/m³): 14,044
- d. Pollutant: **Di-isobutyl ketone**
TLV (mg/m³): 145.440
Maximum Hourly Emission Rate (pounds/hour): 33.11
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 61.56
MAGLC (ug/m³): 3,463
- e. Pollutant: **Ethanol**
TLV (mg/m³): 1,884.254
Maximum Hourly Emission Rate (pounds/hour): 33.11
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 61.56
MAGLC (ug/m³): 44,863
- f. Pollutant: **Methyl isobutyl ketone**
TLV (mg/m³): 204.826
Maximum Hourly Emission Rate (pounds/hour): 33.11
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 61.56
MAGLC (ug/m³): 4,877
- g. Pollutant: **Methanol**
TLV (mg/m³): 262.09
Maximum Hourly Emission Rate (pounds/hour): 33.11
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 61.56
MAGLC (ug/m³): 6,240.24

[Authority for term: OAC rule 3745-77-07(B)(2) and PTI P0114627]

- (12) Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");



- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

[Authority for term: OAC rule 3745-77-07(B)(2) and PTI P0114627]

- (13) If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.

[Authority for term: OAC rule 3745-77-07(B)(2) and PTI P0114627]

- (14) The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

[Authority for term: OAC rule 3745-77-07(B)(2) and PTI P0114627]

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in the burners serving the RTO controlling this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0114627]



- (2) The permittee shall notify the Cleveland DAQ in writing of any record showing that the PE control device(s) were not in service when the associated paint manufacturing equipment was in operation and pigment was being blended. The notification shall include a copy of such record and shall be sent to the Cleveland DAQ within 30 days after the event occurs.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0114627]

- (3) The permittee shall submit quarterly temperature deviation (excursion) reports that identify all 3-hour blocks of time (eight 3-hour blocks per day), when the emissions unit was in operation, during which
 - a. the average combustion temperature within the RTO was more than 50 degrees Fahrenheit below the average temperature during the most recent emissions test that demonstrated the emissions unit was in compliance.

[Authority for term: OAC rule 3745-77-07(C)(1)), OAC 3745-21-09(B)(4)(c), and PTI P0114627]

- (4) The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the VOC emission rate exceeded the limitation in b)(1).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0114627]

- (5) Except as otherwise provided in paragraph (MM)(4) of OAC rule 3745-21-09 (see b)(2)e.), the permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the concentrator/RTO system was not in service when the emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0114627]

- (6) The quarterly deviation (excursion) reports shall be submitted in accordance with the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0114627]

- (7) The permittee shall submit semiannual written reports that (a) identify all days during which any visible PE were observed from the concentrator/RTO stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible PE. These reports shall be submitted to the Cleveland DAQ by January 31 and July 31 of each year and shall cover the previous six-month period.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0114627]



- (8) The permittee shall submit semiannual written reports that (a) identify all days during which any visible PE were observed from the from the primary dust collectors, 600-DC-1 and 52-DC-1, stacks serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible PE. These reports shall be submitted to the Cleveland DAQ by January 31 and July 31 of each year and shall cover the previous six-month period.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0114627]

- (9) The permittee shall submit semiannual written reports that (a) identify all days during which any visible fugitive emissions were observed from the egress points of the buildings serving this emissions unit where powdered raw materials are transferred into process equipment and (b) describe any corrective actions taken to eliminate the visible fugitive emissions. These reports shall be submitted to the Cleveland DAQ by January 31 and July 31 of each year and shall cover the previous six-month period.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0114627]

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

VOC emissions shall not exceed 145.0 tons per year as a rolling, twelve-month summation for K201 and P201 combined.

Applicable Compliance Method:

The permittee shall calculate the combined monthly VOC emissions from K201 and P201 as follows:

Controlled monthly emissions = on line hours/month of the concentrator/RTO system recorded in d)(7) X 7.1 pounds VOC/hour* X 1 ton/2000 pounds

Uncontrolled monthly emissions = "off line" hours/month of the concentrator/RTO system recorded in d)(7) X 78.7 pounds VOC/hour* X 1 ton/2000 pounds

Total monthly actual emissions = Controlled monthly emissions + Uncontrolled monthly emissions

The permittee shall calculate the rolling, twelve-month VOC emissions as the sum of the VOC emissions from the current calendar month and the previous 11 calendar months.



* These emission factors are based upon testing conducted in September 2008 for K201 and P201. The factors are the additive average inlet VOC emission rate of 35.8 pounds/hour for K201 and 42.9 pounds/hour for P201 and the average outlet VOC emission rate of 7.1 pounds/hour for the K201 and P201 exhaust stack. The permittee shall use the emission factors from the most recent emissions test that demonstrated the emissions unit was in compliance for purposes of this calculation.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0114627]

b. Emission Limitations:

Particulate emissions (PE) (stack and fugitive combined) shall not exceed 1.4 pounds per hour and 6.0 tons per year as a rolling, twelve-month summation.

Applicable Compliance Method:

The PE limitations were established as follows:

Actual, worst case annual PE rate (stack and fugitive combined) = (Maximum annual pigment usage) X (0.01 pound PE/pound pigment*) X (1-0.99**) X (1 ton/2000 pounds) + (Maximum annual pigment usage) X (0.01 pound PE/pound pigment*) X (1- 0.995***) X (1 ton/2000 pounds) = tons PE/year

Where:

Maximum annual pigment usage = 80,000,000 pounds/year

*The emission factor in USEPA's Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Section 6.4, Table 6.4-1, Uncontrolled Emission Factors for Paint and Varnish Manufacturing, (5/83) for PE is 20 pounds PE per ton pigment or 1% loss (equivalent to 1 pound PE per 100 pounds pigment or 0.01 pound PE/pound pigment).

**estimated control efficiency of the PE control device(s), expressed as a fraction

***estimated PE capture efficiency of the PE control device(s), expressed as a fraction

Using the above equation, the PE rate (stack and fugitive combined) = 6.0 tons PE per year.

Therefore, the permittee may assume an emission rate from this emissions unit of 6.0 tons PE per year as a rolling, twelve-month summation.

The lbs PE/hr emission limitation was established as follows: (6.0 tons PE per year) X (2000 pounds/ton) X (1 year/8760 hours) = 1.4 pounds per hour



If required, the permittee shall demonstrate compliance with applicable emission limitations through emission testing performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 5.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0114627]

c. Emission Limitation:

Visible PE from the concentrator/RTO stack shall not exceed 5% opacity, as a 6-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0114627]

d. Emission Limitation:

Visible PE from the primary dust collectors (600-DC-1 baghouse and 52-DC-1) stack shall not exceed 5% opacity, as a 6-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0114627]

e. Emission Limitation:

Visible fugitive PE shall not exceed 5% opacity, as a 3-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0114627]

(2) 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 5 years of the date of the most recent compliance test. The most recent compliance test was performed on 11/5/2013. If necessary, testing may be performed beyond the five-year window provided approval is granted by the Cleveland DAQ.



- b. The emission testing shall be conducted to demonstrate compliance with the allowable concentration of VOC in the exhaust stream, overall control efficiency limitation for VOC or the minimum incinerations temperature of one thousand five hundred degrees Fahrenheit.
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):
 - i. Method 1-4 of 40 CFR Part 60; and
 - ii. Method 18, 25 or 25A, as applicable, of 40 CFR Part 60

Concurrent visible emissions observations at the concentrator/RTO stack shall be conducted during the emission testing in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

Concurrent visible emissions observations at the primary dust collector stack shall be conducted during the emission testing in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

Concurrent visible fugitive emissions observations at the building egress points of the buildings serving this emissions unit where powdered raw materials are transferred into process equipment shall be conducted during the emission testing in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

- d. The test(s) shall be conducted in accordance with applicable provisions in OAC rule 3745-21-10 and 40 CFR Part 63 Subparts A, SS, and HHHHH. The test(s) shall be conducted while the emission unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Cleveland Division of Air Quality.
- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Cleveland DAQ. 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 Cleveland DAQ's refusal to accept the results of the emission test(s).

- f. Personnel from the Cleveland DAQ 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.
- g. 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 Cleveland DAQ 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 Cleveland DAQ.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0114627]

g) Miscellaneous Requirements

- (1) None.



3. P202, Water-based Production

Operations, Property and/or Equipment Description:

Dedicated waterbased paint production equipment as defined in OAC rule 3745-21-09(MM)(4).

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) d)(3).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) PTI P0114627	<p>Volatile organic compounds (VOC) emissions shall not exceed 5.0 tons per year as a rolling, twelve-month summation.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(MM)(4).</p>
b.	OAC rule 3745-21-09(MM)(4)	See b)(2)a. below.
c.	40 CFR Part 63, Subpart HHHHH	The permittee shall comply with the applicable requirements of 40 CFR Part 63, Subpart HHHHH (National Emission Standards for Hazardous Air Pollutants: Miscellaneous Coating Manufacturing) as specified in Section B.

(2) Additional Terms and Conditions

a. The requirements of paragraphs (MM)(2) and (MM)(3) of OAC rule 3745-21-09(MM) shall not apply to any specific piece of equipment included within the paint manufacturing operations or the paint laboratory operations during the processing or use of a waterbased paint material in said equipment, provided the following three conditions are met:



- i. the equipment is dedicated solely to the production of waterbased paint materials;
 - ii. the VOC content of each waterbased paint material is less than or equal to 12.0 percent VOC by weight as determined under paragraph (B) of OAC rule 3745-21-10; and
 - iii. any VOC emissions from the processing or use of the waterbased paint materials that are not vented to the control systems specified in paragraphs (MM)(2) and (MM)(3) of OAC rule 3745-21-09(MM) are included (accounted for) in a permit to install issued by the Director after August 22, 1990 pursuant to OAC Chapter 3745-31. These permits to install are identified in Table A: List of Permits of Install Issued to PPG Industries Ohio, Inc., Cleveland, Ohio.
- c) Operational Restrictions
 - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) For any specific piece of equipment included within the paint manufacturing operations or the paint laboratory operations, for which the owner or operator claims an exemption from the requirements of paragraphs (MM)(2) and (MM)(3) of OAC rule 3745-21-09(MM), pursuant to paragraph (MM)(4) of OAC rule 3745-21-09(MM), the permittee shall keep daily records of the following information:
 - a. the periods of time during which there is no production activity or laboratory activity; and
 - b. the VOC content of the waterbased paint material (in per cent VOC by weight), and if applicable, the application number for the permit to install which authorizes the use of the waterbased paint materials.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0114627]
 - (2) The permittee shall maintain records of the monthly and the rolling, twelve-month VOC emissions from this emissions unit, in tons.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0114627]
 - (3) Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the



composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0114627]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that include the following information:

a. An identification of each day during which the VOC content of the waterbased paint material (in percent VOC by weight) for any specific piece of equipment included within the paint manufacturing operations or the paint laboratory operations, for which the owner or operator claims an exemption from the requirements of paragraphs (MM)(2) and (MM)(3) of OAC rule 3745-21-09(MM), exceeded 12.0 percent and the actual VOC content of the waterbased paint material for each such day.

b. An identification of each month during which the VOC emissions exceeded the limitation in b)(1).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0114627]

(2) The deviation (excursion) reports shall be submitted in accordance with the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0114627]

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

VOC emissions shall not exceed 5.0 tons per year as a rolling, twelve-month summation.

Applicable Compliance Method:

The VOC emissions from the dedicated waterbased paint production equipment shall be determined using the most recent version of USEPA's TANKS Program and the information contained in the following table.



Dimensions and Content Information for Emissions Unit P202: Process Tanks - for VOC Emission Calculation Purposes During Paint Production						
Company ID	Nominal Capacity, gallons	Diameter of tank or equivalent, feet	Height of tank, feet	Location of tank	Molecular weight of content of tank	Vapor pressure of content of tank, psia
22-T-48	6,000	10	10	Indoor	100	0.4
22-T-49	4,200	10	7.2	Indoor	100	0.4
22-T-50	4,000	10	6.8	Indoor	100	0.4
22-T-51	5,000	10	8.5	Indoor	100	0.4
22-T-52	5,000	10	8.5	Indoor	100	0.4
22-T-53	5,000	10	8.5	Indoor	100	0.4
22-T-54	5,000	10	8.5	Indoor	100	0.4
22-T-55	5,000	10	8.5	Indoor	100	0.4
22-T-56	20,000	12	24	Indoor	100	0.4
22-T-57	20,000	12	24	Indoor	100	0.4
22-T-63	20,000	12	24	Indoor	100	0.4
22-T-67	6,000	10	10	Indoor	100	0.4
22-T-69	6,000	10	10	Indoor	100	0.4
22-T-71	5,000	10	8.5	Indoor	100	0.4
22-T-72	5,000	10	8.5	Indoor	100	0.4
22-T-73	15,000	11.5	19	Indoor	100	0.4
22-T-74	15,000	11.5	19	Indoor	100	0.4

Dimensions and Content Information for Emissions Unit P202: Process Tanks - for VOC Emission Calculation Purposes During Process Tank Cleaning						
Company ID	Nominal Capacity, gallons	Diameter of tank or equivalent, feet	Height of tank, feet	Location of tank	Molecular weight of content of tank	Vapor pressure of content of tank, psia
22-T-48	6,000	10	10	Indoor	72	2.1
22-T-49	4,200	10	7.2	Indoor	72	2.1



22-T-50	4,000	10	6.8	Indoor	72	2.1
22-T-51	5,000	10	8.5	Indoor	72	2.1
22-T-52	5,000	10	8.5	Indoor	72	2.1
22-T-53	5,000	10	8.5	Indoor	72	2.1
22-T-54	5,000	10	8.5	Indoor	72	2.1
22-T-55	5,000	10	8.5	Indoor	72	2.1
22-T-56	20,000	12	24	Indoor	72	2.1
22-T-57	20,000	12	24	Indoor	72	2.1
22-T-63	20,000	12	24	Indoor	72	2.1
22-T-67	6,000	10	10	Indoor	72	2.1
22-T-69	6,000	10	10	Indoor	72	2.1
22-T-71	5,000	10	8.5	Indoor	72	2.1
22-T-72	5,000	10	8.5	Indoor	72	2.1
22-T-73	15,000	11.5	19	Indoor	72	2.1
22-T-74	15,000	11.5	19	Indoor	72	2.1

The permittee shall calculate the monthly VOC emissions as the sum of the VOC emissions from the current calendar month and the previous 11 calendar months.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0114627]

b. Emission Limitation:

The VOC content of each waterbased paint material is less than or equal to 12.0 percent VOC by weight

Applicable Compliance Method:

Compliance shall be demonstrated based on the record keeping in d)(1).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0114627]



g) Miscellaneous Requirements

(1) None.

List of Tables

Table 1: Non-Insignificant Emissions Units Table 1.
Table 2: Paint Laboratory Operations Emissions Units Table 2.
Table 3: Paint Manufacturing Operations Emissions Units Table 3.
Table 4: Dedicated Waterbased Paint Production Equipment Table 4.



Table 1: Non-Insignificant Emissions Units

The non-insignificant emissions units included in this permit to install (PTI 13-03881) are specified in the following table

	Emissions Unit ID	Emissions Unit Description
1	K201	Paint laboratory operations (see Table 2: Paint Laboratory Operations Emissions Units), controlled by a water curtain or dry filtration systems located upstream of four rotary concentrator wheels and a regenerative thermal oxidizer (RTO)
2	P201	Paint manufacturing operations (see Table 3: Paint Manufacturing Operations Emissions Units), controlled by four rotary concentrator wheels and a RTO , 2 stand alone primary dust collectors (600-DC-1 baghouse and 52-DC-1) and three dust collectors: 9-DC-1 baghouse, 19-DC-1 baghouse, and 21-DC-1 baghouse. P201 is located upstream of the four rotary concentrator wheels and a RTO
3	P202	Dedicated waterbased paint production equipment as defined in OAC rule 3745-21-09(MM)(4) (see Table 4: Dedicated Waterbased Paint Production Equipment)



Table 2: Paint Laboratory Operations Emissions Units (K201)

As specified in OAC rule 3745-21-09(MM)(1), the paint laboratory operations under OAC rule 3745-21-09(MM)(3) include the following equipment for the processing or use of solvent based or waterbased paint materials: paint spray booths and associated ovens within the paint manufacturing quality control laboratory and the paint research laboratory.

Table 2: Paint Laboratory Operations Emissions Units (K201)			
#	Building or Location	Equipment Number	Equipment Type
1.	3	3-DM-1	Dispense Machine
2.	3	3-S1.5 -01	Premier Mill
3.	3	3-S1.5 -02	Premier Mill
4.	3	3-S1.5 -03	Premier Mill
5.	3	3-S1.5 -04	Premier Mill
6.	3	3-DYN-04 -	Premier Mill
7.	3	3-SS-1	Solvent Sink (cold cleaner)
8.	4	4-O-01	Lab Oven
9.	4	4-O-03	Lab Oven
10.	4	4-O-04	Lab Oven



#	Building or Location	Equipment Number	Equipment Type
11.	4	4-O-05	Lab Oven
12.	4	4-O-06	Lab Oven
13.	4	4-O-07	Lab Oven
14.	4	4-O-08	Lab Oven
15.	4	4-O-09	Lab Oven
16.	4	4-O-10	Lab Oven
17.	4	4-O-11	Lab Oven
18.	4	4-EF-8	Solvent Sink (cold cleaner)
19.	4	4-SB-1	Spraybooth
20.	4	4-SB-5	Spraybooth
21.	4	4-SB-6	Spraybooth
22.	5	5-O-1	Lab Oven
23.	5	5-O-13	Lab Oven
24.	5	5-O-14	Lab Oven
25.	5	5-O-2	Lab Oven



#	Building or Location	Equipment Number	Equipment Type
26.	5	5-O-3	Lab Oven
27.	5	5-O-4	Lab Oven
28.	5	5-O-5	Lab Oven
29.	5	5-SB-1	Spraybooth
30.	5	5-SB-2	Spraybooth
31.	5	5-SB-3	Spraybooth
32.	5	5-SB-4	Spraybooth
33.	5	5-SB-5	Spraybooth
34.	6A	6A-O-1	Lab Oven
35.	6A	6A-O-2	Lab Oven
36.	6A	6A-O-3	Lab Oven
37.	6A	6A-O-4	Lab Oven
38.	6A	6A-SB-3	Spraybooth
39.	6A	6A-SB-4	Spraybooth
40.	6A	6A-SB-5	Spraybooth



Table 2: Paint Laboratory Operations Emissions Units (K201)			
#	Building or Location	Equipment Number	Equipment Type
41.	6A	6A-SB-6	Spraybooth
42.	6A	6A-SB-7	Spraybooth
43.	15A	15A-FH-1	Lab Fume Hood
44.	15A	15A-FH-2	Lab Fume Hood
45.	15A	15A-LB-1	Lab Bench
46.	15A	15A-SS-1	Solvent Sink (cold cleaner)
47.	22D	22D-SB-1	Spraybooth
48.	30	30-HW-1	Hot Water Tank - less than 10MMBtu/hr
49.	30	30-O-1	Lab Oven
50.	30	30-O-2	Lab Oven
51.	30	30-O-3	Lab Oven
52.	30	30-O-4	Lab Oven
53.	30	30-O-5	Lab Oven
54.	30	30-O-6	Lab Oven
55.	30	30-SS-1	Solvent Sink



Table 2: Paint Laboratory Operations Emissions Units (K201)			
#	Building or Location	Equipment Number	Equipment Type
56.	30	30-SS-2	Solvent Sink
57.	30	30-FH-1	Lab Fume Hood
58.	46	46-0-B02-FH-04	Lab Fume Hood
59.	46	46-0-B02-O-12	Lab Oven
60.	46	46-0-B02-O-13	Lab Oven
61.	46	46-0-B02-O-14	Lab Oven
62.	46	46-0-B02-O-16	Lab Oven
63.	46	46-0-B02-SB-07	Spraybooth
64.	46	46-0-B02-SB-09	Spraybooth
65.	46	46-0-B02-SB-10	Spraybooth
66.	46	46A-0-B04-04	Lab Isotemp Oven
67.	46	46-0-B04-FH-01	Lab Fume Hood
68.	46	46-0-B04-O-01	Lab Oven
69.	46	46-0-B04-O-02	Lab Oven
70.	46	46-0-B04-O-17	Lab Oven



#	Building or Location	Equipment Number	Equipment Type
71.	46	46-0-B04-O-19	Lab Oven
72.	46	46-0-B04-SB-01	Spraybooth
73.	46	46-0-B04-SB-02	Spraybooth
74.	46	46-0-B08-O-2	Lab Oven
75.	46	46-0-B08-O-4	Lab Oven
76.	46	46-0-B15-FH-03	Lab Fume Hood
77.	46	46-0-B15-O-09	Lab Oven
78.	46	46-0-B15-O-10	Lab Oven
79.	46	46-0-B15-O-11	Lab Oven
80.	46	46-0-B15-SB-03	Spraybooth
81.	46	46-0-B15-SB-08	Spraybooth
82.	46	46-0-B17-O-05	Lab Oven
83.	46	46-0-B17-O-06	Lab Oven
84.	46	46-0-B17-O-07	Lab Oven
85.	46	46-0-B17-O-08	Lab Oven



Table 2: Paint Laboratory Operations Emissions Units (K201)			
#	Building or Location	Equipment Number	Equipment Type
86.	46	46-0-B17-SB-04	Spraybooth
87.	46	46-0-B17-SB-06	Spraybooth
88.	46	46-1-101-O-06	Lab Oven
89.	46	46-1-101-O-07	Lab Oven
90.	46	46-1-101-O-08	Lab Oven
91.	46	46-1-101-SB-06	Spraybooth
92.	46	46-1-101-SS-11	Solvent Sink (cold cleaner)
93.	46	46-1-102-SS-10	Solvent Sink (cold cleaner)
94.	46	46-1-103-SB-04	Spraybooth
95.	46	46-1-103-SB-05	Spraybooth
96.	46	46-1-103-SS-09	Solvent Sink (cold cleaner)
97.	46	46-1-105-O-01	Lab Oven
98.	46	46-1-105-O-03	Lab Oven
99.	46	46-1-105-O-04	Lab Oven
100.	46	46-1-105-O-05	Lab Oven



Table 2: Paint Laboratory Operations Emissions Units (K201)			
#	Building or Location	Equipment Number	Equipment Type
101.	46	46-1-105-O-09	Lab Oven
102.	46	46-1-105-SB-03	Spraybooth
103.	46	46-1-105-SS-07	Solvent Sink (cold cleaner)
104.	46	46-1-105-SS-08	Solvent Sink (cold cleaner)
105.	46	46-1-107-SS-05	Solvent Sink (cold cleaner)
106.	46	46-1-107-SS-06	Solvent Sink (cold cleaner)
107.	46	46-1-108-O-02	Lab Oven
108.	46	46-1-108-SB-01	Spraybooth
109.	46	46-1-108-SB-02	Spraybooth
110.	46	46-1-108-SS-01	Solvent Sink (cold cleaner)
111.	46	46-1-108-SS-04	Solvent Sink (cold cleaner)
112.	46	46-1-109-SS-02	Solvent Sink (cold cleaner)
113.	46	46-1-109-SS-03	Solvent Sink (cold cleaner)
114.	46	46-1-118A-FH-03	Lab Fume Hood
115.	46	46-1-118A-FH-04	Lab Fume Hood



Table 2: Paint Laboratory Operations Emissions Units (K201)			
#	Building or Location	Equipment Number	Equipment Type
116.	46	46-1-118A-FH-05	Lab Fume Hood
117.	46	46-1-118B-FH-06	Lab Fume Hood
118.	46	46-1-118C-FH-07	Lab Fume Hood
119.	46	46-1-118C-FH-08	Lab Fume Hood
120.	46	46-2-108-FH-18	Lab Fume Hood
121.	46	46-206-2-206-O-07	Lab Oven
122.	46	46-2-201-FH-12	Lab Fume Hood
123.	46	46-2-201-O-14	Lab Oven
124.	46	46-2-201-O-15	Lab Oven
125.	46	46-2-201-O-16	Lab Oven
126.	46	46-2-201-SB-09	Spraybooth
127.	46	46-2-201-SS-12	Solvent Sink (cold cleaner)
128.	46	46-2-202-H-13	Lab Fume Hood
129.	46	46-2-202-SB-08	Spraybooth
130.	46	46-2-202-SS-13	Solvent Sink (cold cleaner)



Table 2: Paint Laboratory Operations Emissions Units (K201)			
#	Building or Location	Equipment Number	Equipment Type
131.	46	46-2-203-FH-14	Lab Fume Hood
132.	46	46-2-203-FH-15	Lab Fume Hood
133.	46	46-2-203-FH-26A	Lab Fume Hood
134.	46	46-2-203-O-10	Lab Oven
135.	46	46-2-203-O-11	Lab Oven
136.	46	46-2-203-O-12	Lab Oven
137.	46	46-2-203-O-13	Lab Oven
138.	46	46-2-203-SB-05	Spraybooth
139.	46	46-2-203-SB-06	Spraybooth
140.	46	46-2-203-SS-14	Solvent Sink (cold cleaner)
141.	46	46-2-203-SS-15	Solvent Sink (cold cleaner)
142.	46	46-2-205-FH-16	Lab Fume Hood
143.	46	46-2-205-FH-17	Lab Fume Hood
144.	46	46-2-205-FH-26	Lab Fume Hood
145.	46	46-2-205-O-07	Lab Oven



Table 2: Paint Laboratory Operations Emissions Units (K201)			
#	Building or Location	Equipment Number	Equipment Type
146.	46	46-2-205-O-08	Lab Oven
147.	46	46-2-205-O-09	Lab Oven
148.	46	46-2-205-O-10	Lab Oven
149.	46	46-2-205-O-11	Lab Oven
150.	46	46-2-205-SS-16	Solvent Sink (cold cleaner)
151.	46	46-2-205-SS-17	Solvent Sink (cold cleaner)
152.	46	46-2-208-O-20	Lab Oven
153.	46	46-2-208-O-21	Lab Oven
154.	46	46-2-208-O-22	Lab Oven
155.	46	46-2-208-FH-18	Lab Fume Hood
156.	46	46-2-208-SB-13	Spraybooth
157.	46	46-2-208-SB-14	Spraybooth
158.	46	46-2-208-SS-18	Solvent Sink (cold cleaner)
159.	46	46-2-210-FH-24	Lab Fume Hood
160.	46	46-2-210-O-18	Lab Oven



Table 2: Paint Laboratory Operations Emissions Units (K201)			
#	Building or Location	Equipment Number	Equipment Type
161.	46	46-2-210-O-19	Lab Oven
162.	46	46-2-210-SB-07	Spraybooth
163.	46	46-2-210-SS-24	Solvent Sink (cold cleaner)
164.	46	46-2-211-FH-23	Lab Fume Hood
165.	46	46-2-211-O-06	Lab Oven
166.	46	46-2-211-O-17	Lab Oven
167.	46	46-2-211-SS-23	Solvent Sink (cold cleaner)
168.	46	46-2-212-FH-22	Lab Fume Hood
169.	46	46-2-212-O-05	Lab Oven
170.	46	46-2-212-SB-11	Spraybooth
171.	46	46-2-212-SS-22	Solvent Sink (cold cleaner)
172.	46	46-2-213-FH-21	Lab Fume Hood
173.	46	46-2-213-O-04	Lab Oven
174.	46	46-2-213-SS-21	Solvent Sink (cold cleaner)
175.	46	46-2-214-FH-19A	Lab Fume Hood



Table 2: Paint Laboratory Operations Emissions Units (K201)			
#	Building or Location	Equipment Number	Equipment Type
176.	46	46-2-214-FH-20	Lab Fume Hood
177.	46	46-2-214-O-03	Lab Oven
178.	46	46-2-214-SB-02	Spraybooth
179.	46	46-2-214-SS-20	Solvent Sink (cold cleaner)
180.	46	46-2-215-FH-19	Lab Fume Hood
181.	46	46-2-215-O-01	Lab Oven
182.	46	46-2-215-O-02	Lab Oven
183.	46	46-2-215-SB-01	Spraybooth
184.	46	46-2-215-SS-19	Solvent Sink (cold cleaner)
185.	46	46-3-317-FH-23	Lab Fume Hood
186.	46	46-3-317-FH-24	Lab Fume Hood
187.	46	46-3-317-FH-25	Lab Fume Hood
188.	46	46-3-317-FH-25A	Lab Fume Hood
189.	46	46-3-317-FH-25B	Lab Fume Hood
190.	46	46-3-319-FH-19	Lab Fume Hood



Table 2: Paint Laboratory Operations Emissions Units (K201)			
#	Building or Location	Equipment Number	Equipment Type
191.	46	46-3-319-FH-20	Lab Fume Hood
192.	46	46-3-319-FH-21	Lab Fume Hood
193.	46	46-3-319-FH-22	Lab Fume Hood
194.	46A	46A-0-B4-01	Lab Oven
195.	46A	46A-0-B4-02	Lab Oven
196.	46A	46A-0-B4-03	IsoTemp Oven
197.	46A	46A-0-B08-O-05	Lab Oven
198.	46A	46A-0-B08-O-09	Lab Oven
199.	46A	46A-0-B08-O-11	Lab Oven
200.	46A	46A-0-B08-O-12	Lab Oven
201.	46A	46A-0-B08-SB-01	Spraybooth
202.	46A	46A-0-B08-SB-02	Spraybooth
203.	46A	46A-0-B08-SB-03	Spraybooth
204.	46A	46A-0-B08-SB-04	Spraybooth
205.	46A	46A-1-101-FH-11	Lab Fume Hood



#	Building or Location	Equipment Number	Equipment Type
206.	46A	46A-1-102-FH-10	Lab Fume Hood
207.	46A	46A-1-103-FH-09	Lab Fume Hood
208.	46A	46A-1-105-FH-07	Lab Fume Hood
209.	46A	46A-1-105-FH-08	Lab Fume Hood
210.	46A	46A-1-107-FH-05	Lab Fume Hood
211.	46A	46A-1-107-FH-06	Lab Fume Hood
212.	46A	46A-1-108-FH-04	Lab Fume Hood
213.	46A	46A-1-118A-SS-03	Solvent Sink (cold cleaner)
214.	46A	46A-1-118A-SS-04	Solvent Sink (cold cleaner)
215.	46A	46A-1-118A-SS-05	Solvent Sink (cold cleaner)
216.	46A	46A-1-118B-SS-06	Solvent Sink (cold cleaner)
217.	46A	46A-1-118B-SS-07	Solvent Sink (cold cleaner)
218.	46A	46A-1-118C-SS-08	Solvent Sink (cold cleaner)
219.	46A	46A-1-118-O-01	Lab Oven
220.	46A	46A-1-118-O-05	Lab Oven



#	Building or Location	Equipment Number	Equipment Type
221.	46A	46A-1-118-O-06	Lab Oven
222.	46A	46A-1-118-O-07	Lab Oven
223.	46A	46A-1-118-SB-07	Spraybooth
224.	46A	46A-1-118-SB-08	Spraybooth
225.	46A	46A-1-118-SB-09	Spraybooth
226.	46A	46A-1-118-SB-10	Spraybooth
227.	46A	46A-1-119-O-08	Lab Oven
228.	46A	46A-1-119-O-09	Lab Oven
229.	46A	46A-1-119-O-10	Lab Oven
230.	46A	46A-1-119-O-11	Lab Oven
231.	46A	46A-1-119-SB-01	Spraybooth
232.	46A	46A-1-119-SB-02	Spraybooth
233.	46A	46A-1-119-SB-03	Spraybooth
234.	46A	46A-1-119-SB-04	Spraybooth
235.	46A	46A-2-216A-FH-11	Lab Fume Hood



Table 2: Paint Laboratory Operations Emissions Units (K201)			
#	Building or Location	Equipment Number	Equipment Type
236.	46A	46A-2-216A-FH-12	Lab Fume Hood
237.	46A	46A-2-216A-SS-11	Solvent Sink (cold cleaner)
238.	46A	46A-2-216A-SS-12	Solvent Sink (cold cleaner)
239.	46A	46A-2-216B-FH-13	Lab Fume Hood
240.	46A	46A-2-216B-FH-14	Lab Fume Hood
241.	46A	46A-2-216B-FH-15	Lab Fume Hood
242.	46A	46A-2-216B-SS-13	Solvent Sink (cold cleaner)
243.	46A	46A-2-216B-SS-14	Solvent Sink (cold cleaner)
244.	46A	46A-2-216B-SS-15	Solvent Sink (cold cleaner)
245.	46A	46A-2-216C-FH-16	Lab Fume Hood
246.	46A	46A-2-216C-SS-18	Solvent Sink (cold cleaner)
247.	46A	46A-2-216C-SS-16	Solvent Sink (cold cleaner)
248.	46A	46A-2-216C-SS-17	Solvent Sink (cold cleaner)
249.	46A	46A-2-216-O-06	Lab Oven
250.	46A	46A-2-216-O-07	Lab Oven



#	Building or Location	Equipment Number	Equipment Type
251.	46A	46A-2-216-O-08	Lab Oven
252.	46A	46A-2-216-O-09	Lab Oven
253.	46A	46A-2-216-O-10	Lab Oven
254.	46A	46A-2-216-O-11	Lab Oven
255.	46A	46A-2-216-O-12	Lab Oven
256.	46A	46A-2-216-O-13	Lab Oven
257.	46A	46A-2-216-O-14	Lab Oven
258.	46A	46A-2-216-O-15	Lab Oven
259.	46A	46A-2-216-O-16	Lab Oven
260.	46A	46A-2-216-SB-06	Spraybooth
261.	46A	46A-2-216-SB-07	Spraybooth
262.	46A	46A-2-216-SB-08	Spraybooth
263.	46A	46A-2-216-SB-09	Spraybooth
264.	46A	46A-2-216-SB-10	Spraybooth
265.	46A	46A-2-216-SB-11	Spraybooth



Table 2: Paint Laboratory Operations Emissions Units (K201)			
#	Building or Location	Equipment Number	Equipment Type
266.	46A	46A-2-216-SB-13	Spraybooth
267.	46A	46A-2-216-SB-14	Spraybooth
268.	46A	46A-2-216-SL-1	Spray line with two integral electric ovens
269.	46A	46A-2-216-SL-2	Spray line with two integral electric ovens
270.	46A	46A-2-217-FH-10	Lab Fume Hood
271.	46A	46A-2-217-O-01	Lab Oven
272.	46A	46A-2-217-O-02	Lab Oven
273.	46A	46A-2-217-SB-03	Spraybooth
274.	46A	46A-2-217-SB-04	Spraybooth
275.	46A	46A-2-217-SS-10	Solvent Sink (cold cleaner)
276.	46A	46A-2-218-O-02	Lab Oven
277.	46A	46A-2-218-O-03	Lab Oven
278.	46A	46A-2-218-SB-01	Spraybooth
279.	46A	46A-2-218-SB-02	Spraybooth
280.	46A	46A-3-317-O-02	Lab Oven



Table 2: Paint Laboratory Operations Emissions Units (K201)			
#	Building or Location	Equipment Number	Equipment Type
281.	46A	46A-3-317-O-03	Lab Oven
282.	46A	46A-3-317-O-04	Lab Oven
283.	46A	46A-3-317-O-05	Lab Oven
284.	46A	46A-3-317-SB-06	Spraybooth
285.	46A	46A-3-317-SB-07	Spraybooth
286.	46A	46A-3-317-SB-08	Spraybooth
287.	46A	46A-3-317-SB-09	Spraybooth
288.	46A	46A-3-317-SS-23	Solvent Sink (cold cleaner)
289.	46A	46A-3-317-SS-25	Solvent Sink (cold cleaner)
290.	46A	46A-3-319-O-08	Lab Oven
291.	46A	46A-3-319-O-09	Lab Oven
292.	46A	46A-3-319-O-10	Lab Oven
293.	46A	46A-3-319-SB-01	Spraybooth
294.	46A	46A-3-319-SB-02	Spraybooth
295.	46A	46A-3-319-SB-03	Spraybooth



Table 2: Paint Laboratory Operations Emissions Units (K201)			
#	Building or Location	Equipment Number	Equipment Type
296.	46A	46A-3-319-SB-04	Spraybooth
297.	46A	46A-3-319-SS-19	Solvent Sink (cold cleaner)
298.	46A	46A-3-319-SS-20	Solvent Sink (cold cleaner)
299.	46A	46A-3-319-SS-21	Solvent Sink (cold cleaner)
300.	46A	46A-3-319-SS-22	Solvent Sink (cold cleaner)
301.	46A	46A-DYN-1	Premier Mill
302.	46A	46A-DYN-2	Premier Mill
303.	46A	46A-DYN-3	Premier Mill



Table 3: Paint Manufacturing Operations Emissions Units (P201)

As specified in OAC rule 3745-21-09(MM)(1), the paint manufacturing operations under OAC rule 3745-21-09(MM)(2) include the following equipment for the processing or use of solvent based or waterbased paint materials: mixing tanks for paint liquids and pigments, grinding mills, paint thinning and tinting tanks, paint filling equipment for shipping containers, cleaning equipment for paint processing equipment, and recovery equipment for the cleaning solvents.

Table 3: Paint Manufacturing Operations Emissions Units (P201)			
#	Building or Location	Equipment Number	Equipment Type
1.	2	2-H-1	Boiler - less than 10MMBtu/hr
2.	4	4-FH-1	Lab Fume Hood
3.	4	4-FH-2	Lab Fume Hood
4.	4	4-FH-3	Lab Fume Hood
5.	4	4-FH-4	Lab Fume Hood
6.	4	4-FH-5	Lab Fume Hood
7.	4	4-FH-8	Lab Fume Hood
8.	4	4-SS-1	Solvent Sink (cold cleaner)
9.	5	5-SS-1	Solvent Sink (cold cleaner)
10.	5	5-FH-1	Lab Fume Hood
11.	6A	6A-SS-1	Solvent Sink (cold cleaner)



Table 3: Paint Manufacturing Operations Emissions Units (P201)			
#	Building or Location	Equipment Number	Equipment Type
12.	6A	6A-SS-2	Solvent Sink (cold cleaner)
13.	7	7-DS-1	Draw Scale
14.	7	7-SS-1	Solvent Sink (cold cleaner)
15.	7	7-A-1	Agitator
16.	7	7-A-2	Agitator
17.	7	7-A-3	Agitator
18.	7	7-A-4	Agitator
19.	7	7-A-5	Agitator
20.	7	7-A-6	Agitator
21.	7	7-A-7	Agitator
22.	7	7-A-8	Agitator
23.	7	7-HA-1	Hanging Agitator
24.	7	7-HA-2	Hanging Agitator
25.	7	7-HA-3	Hanging Agitator
26.	7	7-HA-4	Hanging Agitator



Table 3: Paint Manufacturing Operations Emissions Units (P201)			
#	Building or Location	Equipment Number	Equipment Type
27.	7	7-S45-01	Premier Mill
28.	7	7-S45-02	Premier Mill
29.	7	7-S45-03	Premier Mill
30.	7	7-S45-04	Premier Mill
31.	7	7-S45-05	Premier Mill
32.	7	7-S90-01	Premier Mill
33.	7	7-S90-02	Premier Mill
34.	7	7-D90-03	Premier Mill
35.	7	7-D90-02	Premier Mill
36.	7	7-S15-03	Premier Mill
37.	7	7-S15-04	Premier Mill
38.	8	8-DS-1	Draw Scale
39.	8	8-T-801	Process Tank
40.	8	8-T-802	Process Tank
41.	8	8-T-803	Process Tank



#	Building or Location	Equipment Number	Equipment Type
42.	8	8-T-804	Process Tank
43.	8	8-T-805	Process Tank
44.	8	8-T-806	Process Tank
45.	8	8-T-807	Process Tank
46.	8	8-T-808	Process Tank
47.	8	8-T-809	Process Tank
48.	8	8-T-810	Process Tank
49.	8	8-T-811	Process Tank
50.	8	8-T-812	Process Tank
51.	8	8-T-813	Process Tank
52.	8	8-T-814	Process Tank
53.	8	8-T-815	Process Tank
54.	8	8-T-816	Process Tank
55.	8	8-T-819	Process Tank
56.	8	8-T-820	Process Tank



Table 3: Paint Manufacturing Operations Emissions Units (P201)			
#	Building or Location	Equipment Number	Equipment Type
57.	8	8-T-821	Process Tank
58.	8	8-T-822	Process Tank
59.	8	8-T-823	Process Tank
60.	8	8-T-824	Process Tank
61.	8	8-T-825	Process Tank
62.	8	8-T-826	Process Tank
63.	8	8-T-827	Process Tank
64.	8	8-T-828	Process Tank
65.	8	8-T-829	Process Tank
66.	8	8-T-830	Process Tank
67.	8	8-T-831	Process Tank
68.	8	8-T-832	Process Tank
69.	8	9-A-1	Mixer
70.	9	9-A-6	Mixer
71.	8	9-A-7	Lift/Agitator



Table 3: Paint Manufacturing Operations Emissions Units (P201)			
#	Building or Location	Equipment Number	Equipment Type
72.	8	9-A-8	Mixer
73.	8	9-A-9	Lift/Agitator
74.	9	9-RM-1A	Rail Mixer
75.	9	9-RM-1B	Rail Mixer
76.	9	9-RM-1C	Rail Mixer
77.	9	9-RM-1D	Rail Mixer
78.	9	9-RM-1E	Rail Mixer
79.	9	9-RM-1F	Rail Mixer
80.	9	9-RM-1G	Rail Mixer
81.	9	9-RM-1H	Rail Mixer
82.	9	9-RM-1I	Rail Mixer
83.	9	9-RM-1J	Rail Mixer
84.	9	9-RM-1K	Rail Mixer
85.	9	9-RM-1L	Rail Mixer
86.	9	9-RM-2F	Rail Mixer



Table 3: Paint Manufacturing Operations Emissions Units (P201)			
#	Building or Location	Equipment Number	Equipment Type
87.	9	9-RM-2E	Rail Mixer
88.	9	9-RM-2D	Rail Mixer
89.	9	9-RM-2C	Rail Mixer
90.	9	9-RM-1	Portable Rail Mixer
91.	9	9-RM-2	Portable Rail Mixer
92.	9	9-SS-3	Solvent Sink (cold cleaner)
93.	9	9-SS-11	Solvent Sink (cold cleaner)
94.	9	9-T-1	Storage Tank
95.	9A	9A-H-1	Heater - less than 10MMBtu/hr
96.	9B	9B-H-2	Heater - less than 10MMBtu/hr
97.	12	12-CB-1	Cleaning Booth
98.	12	12-CB-2	Cleaning Booth
99.	12	12-CB-3	Cleaning Booth
100.	12	12-CB-4	Cleaning Booth
101.	12	12-CB-5	Cleaning Booth



Table 3: Paint Manufacturing Operations Emissions Units (P201)			
#	Building or Location	Equipment Number	Equipment Type
102.	12	12-T-1	Process Tank
103.	12	12-T-2	Process Tank
104.	12	12-T-3	Process Tank
105.	13	13-DCA-1	Drum Changing Area
106.	13	13-HA-31	Drum Agitation Stations
107.	13	13-HA-32	Drum Agitation Stations
108.	13	13-HA-33	Drum Agitation Stations
109.	13	13-HA-34	Drum Agitation Stations
110.	13	13-HA-35	Drum Agitation Stations
111.	13	13-HA-36	Drum Agitation Stations
112.	13	13-HA-37	Drum Agitation Stations
113.	13	13-HA-38	Drum Agitation Stations
114.	13	13-HA-39	Drum Agitation Stations
115.	13	13-HA-40	Drum Agitation Stations
116.	13	13-HA-41	Drum Agitation Stations



#	Building or Location	Equipment Number	Equipment Type
117.	13	13-HA-42	Drum Agitation Stations
118.	13	13-HA-43	Drum Agitation Stations
119.	13	13-HA-44	Drum Agitation Stations
120.	13	13-HA-45	Drum Agitation Stations
121.	13	13-HA-46	Drum Agitation Stations
122.	13	13-HA-47	Drum Agitation Stations
123.	13	13-HA-48	Drum Agitation Stations
124.	13	13-HA-49	Drum Agitation Stations
125.	13	13-HA-50	Drum Agitation Stations
126.	13	13-HA-51	Drum Agitation Stations
127.	13	13-HA-52	Drum Agitation Stations
128.	13	13-HA-53	Drum Agitation Stations
129.	13	13-HA-54	Drum Agitation Stations
130.	13	13-HA-55	Drum Agitation Stations
131.	13	13-HA-56	Drum Agitation Stations



#	Building or Location	Equipment Number	Equipment Type
132.	13	13-HA-57	Drum Agitation Stations
133.	13	13-HA-58	Drum Agitation Stations
134.	13	13-HA-59	Drum Agitation Stations
135.	13	13-HA-60	Drum Agitation Stations
136.	13	13-HA-61	Drum Agitation Stations
137.	13	13-HA-62	Drum Agitation Stations
138.	13	13-HA-63	Drum Agitation Stations
139.	13	13-HA-64	Drum Agitation Stations
140.	13	13-HA-65	Drum Agitation Stations
141.	13	13-HA-66	Drum Agitation Stations
142.	13	13-HA-67	Drum Agitation Stations
143.	13	13-HA-68	Drum Agitation Stations
144.	13	13-HA-69	Drum Agitation Stations
145.	13	13-HA-70	Drum Agitation Stations
146.	13	13-HA-71	Drum Agitation Stations



#	Building or Location	Equipment Number	Equipment Type
147.	13	13-HA-72	Drum Agitation Stations
148.	13	13-HA-73	Drum Agitation Stations
149.	13	13-HA-74	Drum Agitation Stations
150.	13	13-HA-75	Drum Agitation Stations
151.	13	13-HA-76	Drum Agitation Stations
152.	13	13-HA-77	Drum Agitation Stations
153.	13	13-HA-78	Drum Agitation Stations
154.	13	13-HA-79	Drum Agitation Stations
155.	13	13-HA-80	Drum Agitation Stations
156.	13	13-HA-81	Drum Agitation Stations
157.	13	13-HA-82	Drum Agitation Stations
158.	13	13-HA-83	Drum Agitation Stations
159.	13	13-HA-84	Drum Agitation Stations
160.	13	13-HA-85	Drum Agitation Stations
161.	13	13-HA-86	Drum Agitation Stations



#	Building or Location	Equipment Number	Equipment Type
162.	13	13-HA-87	Drum Agitation Stations
163.	13	13-HA-88	Drum Agitation Stations
164.	13	13-HA-89	Drum Agitation Stations
165.	13	13-HA-90	Drum Agitation Stations
166.	14	14-HA-11	Drum Agitation Stations
167.	14	14-HA-12	Drum Agitation Stations
168.	14	14-HA-13	Drum Agitation Stations
169.	14	14-HA-14	Drum Agitation Stations
170.	14	14-HA-15	Drum Agitation Stations
171.	14	14-HA-16	Drum Agitation Stations
172.	14	14-HA-17	Drum Agitation Stations
173.	14	14-HA-18	Drum Agitation Stations
174.	14	14-HA-19	Drum Agitation Stations
175.	14	14-HA-20	Drum Agitation Stations
176.	14	14-HA-21	Drum Agitation Stations



Table 3: Paint Manufacturing Operations Emissions Units (P201)			
#	Building or Location	Equipment Number	Equipment Type
177.	14	14-HA-22	Drum Agitation Stations
178.	14	14-HA-23	Drum Agitation Stations
179.	14	14-HA-24	Drum Agitation Stations
180.	14	14-HA-25	Drum Agitation Stations
181.	14	14-HA-26	Drum Agitation Stations
182.	14	14-HA-27	Drum Agitation Stations
183.	14	14-HA-28	Drum Agitation Stations
184.	14	14-HA-29	Drum Agitation Stations
185.	14	14-HA-30	Drum Agitation Stations
186.	15	15-DM-1	Dispense Machine
187.	15	15-DS-1	Draw Scale
188.	15	15-M-1	Mixer (Hanging)
189.	15	15-T-151	Storage Tank
190.	15	15-T-152	Process Tank
191.	15	15-T-153	Process Tank



#	Building or Location	Equipment Number	Equipment Type
192.	15	15-T-154	Process Tank
193.	15	15-T-155	Process Tank
194.	15	15-T-156	Process Tank
195.	15	15-T-157	Process Tank
196.	15	15-T-8000	Storage Tank
197.	15	15-T-8001	Storage Tank
198.	15	15-T-8002	Storage Tank
199.	15	15-T-8003	Storage Tank
200.	15	15-T-8004	Storage Tank
201.	15	15-T-8005	Storage Tank
202.	15	15-T-8006	Storage Tank
203.	15	15-T-8007	Storage Tank
204.	15	15-T-8008	Storage Tank
205.	15	15-T-8009	Storage Tank
206.	15	15-T-8010	Storage Tank



#	Building or Location	Equipment Number	Equipment Type
207.	15	15-T-8011	Storage Tank
208.	15	15-T-8012	Storage Tank
209.	15	15-T-8013	Storage Tank
210.	15	15-T-8014	Storage Tank
211.	15	15-T-8015	Storage Tank
212.	15	15-T-8016	Storage Tank
213.	15	15-T-8017	Storage Tank
214.	15	15-T-8018	Storage Tank
215.	15	15-T-8019	Storage Tank
216.	15	15-T-8020	Storage Tank
217.	15	15-T-8021	Storage Tank
218.	15	15-T-8022	Storage Tank
219.	15	15-T-8023	Storage Tank
220.	16	16-T-201	Storage Tank
221.	16	16-T-202	Storage Tank



#	Building or Location	Equipment Number	Equipment Type
222.	16	16-T-203	Storage Tank
223.	16	16-T-204	Storage Tank
224.	16	16-T-205	Storage Tank
225.	16	16-T-206	Storage Tank
226.	16	16-T-207	Storage Tank
227.	16	16-T-208	Storage Tank
228.	16	16-T-209	Storage Tank
229.	16	16-T-210	Storage Tank
230.	16	16-T-211	Storage Tank
231.	16	16-T-212	Storage Tank
232.	16	16-T-213	Storage Tank
233.	16	16-T-214	Storage Tank
234.	16	16-T-215	Storage Tank
235.	16	16-T-216	Storage Tank
236.	16	16-T-217	Storage Tank



Table 3: Paint Manufacturing Operations Emissions Units (P201)			
#	Building or Location	Equipment Number	Equipment Type
237.	16	16-T-218	Storage Tank
238.	16	16-T-219	Storage Tank
239.	16	16-T-220	Storage Tank
240.	16	16-T-221	Storage Tank
241.	16	16-T-222	Storage Tank
242.	16	16-T-223	Storage Tank
243.	16	16-T-224	Storage Tank
244.	18	18-B-1	Boiler - less than 10MMBtu/hr
245.	18	18-B-2	Boiler - less than 10MMBtu/hr
246.	18	18-B-3	Boiler - less than 10MMBtu/hr
247.	18	18-B-4	Boiler - less than 10MMBtu/hr
248.	18	18-B-5	Boiler - less than 10MMBtu/hr
249.	18	18-B-6	Boiler - less than 10MMBtu/hr
250.	18	18-B-7	Boiler - less than 10MMBtu/hr
251.	18	18-T-1	Water Receiver Tank



Table 3: Paint Manufacturing Operations Emissions Units (P201)			
#	Building or Location	Equipment Number	Equipment Type
252.	18	18-DA-1	Deaerator Tank
253.	19	19-M-01	Mixer
254.	19	19-M-02	Mixer
255.	19	19-M-03	Mixer
256.	19	19-M-04	Mixer
257.	19	19-M-05	Mixer
258.	19	19-M-06	Mixer
259.	19	19-M-08	Mixer
260.	19	19-M-09	Mixer
261.	19	19-M-10	Mixer
262.	19	19-M-11	Mixer
263.	19	19-M-12	Mixer
264.	19	19-T-1	Storage Tank
265.	19	19-T-2	Storage Tank
266.	20	20-T-001	Emergency Overflow Tank



Table 3: Paint Manufacturing Operations Emissions Units (P201)			
#	Building or Location	Equipment Number	Equipment Type
267.	20	20-T-002	Emergency Overflow Tank
268.	21	21-M-01	Mixer (garage)
269.	21	21-D200-2	Premier Mill
270.	21	21-S45-9	Premier Mill
271.	21	21-D120-1	Premier Mill
272.	21	21-T90-1	Triplex Premier Mill
273.	21	21-S90-4	Premier Mill
274.	21	21-D200-1	Premier Mill
275.	21	21-S1.5-1	Premier Mill
276.	21	21-T-001	Process Tank
277.	21	21-T-002	Process Tank
278.	21	21-T-003	Process Tank
279.	21	21-T-004	Process Tank
280.	21	21-T-005	Process Tank
281.	21	21-T-006	Process Tank



#	Building or Location	Equipment Number	Equipment Type
282.	21	21-T-007	Process Tank
283.	21	21-T-008	Process Tank
284.	21	21-T-013	Process Tank
285.	21	21-T-014	Process Tank
286.	21	21-T-030	Process Tank
287.	21	21-T-031	Process Tank
288.	21	21-T-032	Process Tank
289.	21	21-T-033	Process Tank
290.	21	21-T-034	Process Tank
291.	21	21-T-035	Process Tank
292.	21	21-T-036	Process Tank
293.	21	21-T-037	Process Tank
294.	21	21-T-038	Process Tank
295.	21	21-T-039	Process Tank
296.	21	21-T-040	Process Tank



Table 3: Paint Manufacturing Operations Emissions Units (P201)			
#	Building or Location	Equipment Number	Equipment Type
297.	21	21-T-041	Process Tank
298.	21	21-T-042	Process Tank
299.	21	21-T-043	Process Tank
300.	21	21-T-044	Process Tank
301.	21	21-T-045	Process Tank
302.	21	21-T-046	Process Tank
303.	21	21-T-047	Process Tank
304.	21	21-T-076	Process Tank
305.	23	23-DM-1	Dispense Machine
306.	23	23-DM-2	Slurry Dispense Machine
307.	23	23-LB-1	Lab Bench
308.	23	23-SS-5	Solvent Sink (cold cleaner)
309.	23	23-T-01	Storage Tank
310.	23	23-T-02	Storage Tank
311.	23	23-T-03	Storage Tank



#	Building or Location	Equipment Number	Equipment Type
312.	23	23-T-04	Storage Tank
313.	23	23-T-05	Storage Tank
314.	23	23-T-06	Storage Tank
315.	23	23-T-07	Storage Tank
316.	23	23-T-08	Storage Tank
317.	23	23-T-09	Storage Tank
318.	23	23-T-10	Storage Tank
319.	23	23-T-11	Storage Tank
320.	23	23-T-12	Storage Tank
321.	23	23-T-13	Storage Tank
322.	23	23-T-14	Storage Tank
323.	23	23-T-15	Storage Tank
324.	23	23-T-16	Storage Tank
325.	23	23-T-17	Storage Tank
326.	23	23-T-18	Storage Tank



#	Building or Location	Equipment Number	Equipment Type
327.	23	23-T-20	Storage Tank
328.	23	23-T-21	Storage Tank
329.	23	23-T-22	Storage Tank
330.	23	23-T-23	Storage Tank
331.	23	23-T-24	Storage Tank
332.	23	23-T-25	Storage Tank
333.	23	23-T-26	Storage Tank
334.	23	23-T-27	Storage Tank
335.	23	23-T-28	Storage Tank
336.	23	23-T-32	Storage Tank
337.	23	23-T-101	Storage Tank
338.	23	23-T-102	Storage Tank
339.	24	24-A-6	Mixer
340.	24	24-DS-1	Draw Scale
341.	24	24-S90-3	Premier Mill



#	Building or Location	Equipment Number	Equipment Type
342.	24	24-T-501	Storage Tank
343.	24	24-T-502	Process Tank
344.	24	24-T-503	Storage Tank
345.	24	24-T-504	Storage Tank
346.	24	24-T-505	Storage Tank
347.	24	24-T-506	Process Tank
348.	24	24-T-507	Process Tank
349.	24	24-T-508	Process Tank
350.	24	24-T-509	Storage Tank
351.	24	24-T-510	Storage Tank
352.	24	24-T-511	Storage Tank
353.	24	24-T-512	Storage Tank
354.	24	24-T-513	Process Tank
355.	24	24-T-514	Process Tank
356.	24	24-T-515	Process Tank



Table 3: Paint Manufacturing Operations Emissions Units (P201)			
#	Building or Location	Equipment Number	Equipment Type
357.	24	24-T-516	Process Tank
358.	24	24-T-517	Process Tank
359.	24	24-T-518	Process Tank
360.	24	24-T-519	Process Tank
361.	24	24-T-520	Process Tank
362.	24	24-T-521	Process Tank
363.	24	24-T-522	Process Tank
364.	24	24-T-523	Process Tank
365.	24	24-T-524	Process Tank
366.	24	24-T-525	Process Tank
367.	24	24-T-526	Process Tank
368.	24	24-T-527	Storage Tank
369.	24	24-T-528	Storage Tank
370.	24B	24B-CB-1	Tankwagon Rinsing
371.	25	25-15L-01	Premier Mill (PKAF)



#	Building or Location	Equipment Number	Equipment Type
372.	25	25-A-1	Agitator
373.	25	25-A-2	Agitator
374.	25	25-HA-1	Hanging Agitator
375.	25	25-HA-2	Hanging Agitator
376.	25	25-D90-1	Premier Mill
377.	25	25-S60-1	Premier Mill
378.	25	25-D200-3	Premier Mill
379.	25	25-S45-8	Premier Mill
380.	25	25-SS-6	Solvent Sink (cold cleaner)
381.	25	25-RM-1	Portable Rail Mixer
382.	26	26-T-321	Storage Tank
383.	26	26-T-322	Storage Tank
384.	26	26-T-323	Storage Tank
385.	26	26-T-324	Storage Tank
386.	26	26-T-325	Storage Tank



#	Building or Location	Equipment Number	Equipment Type
387.	26	26-T-326	Storage Tank
388.	26	26-T-327	Storage Tank
389.	26	26-T-328	Storage Tank
390.	26	26-T-329	Storage Tank
391.	26	26-T-330	Storage Tank
392.	28	28-O-1	Lab Oven
393.	28	28-O-2	Lab Oven
394.	28	28-T-401	Storage Tank
395.	28	28-T-402	Storage Tank
396.	28	28-T-403	Storage Tank
397.	28	28-T-404	Storage Tank
398.	28	28-T-405	Storage Tank
399.	28	28-T-406	Storage Tank
400.	28	28-T-407	Storage Tank
401.	28	28-T-408	Storage Tank



#	Building or Location	Equipment Number	Equipment Type
402.	28	28-T-409	Storage Tank
403.	28	28-T-410	Storage Tank
404.	28	28-T-411	Storage Tank
405.	28	28-T-412	Storage Tank
406.	28	28-T-413	Storage Tank
407.	28	28-T-414	Storage Tank
408.	28	28-T-415	Storage Tank
409.	28	28-T-416	Storage Tank
410.	28	28-T-417	Storage Tank
411.	28	28-T-418	Storage Tank
412.	28	28-T-419	Storage Tank
413.	28	28-T-420	Storage Tank
414.	28	28-T-421	Storage Tank
415.	28	28-T-422	Storage Tank
416.	28	28-T-423	Storage Tank



#	Building or Location	Equipment Number	Equipment Type
417.	28	28-T-424	Storage Tank
418.	28	28-T-425	Storage Tank
419.	28	28-T-426	Storage Tank
420.	28	28-T-427	Storage Tank
421.	28	28-T-428	Storage Tank
422.	28	28-T-429	Storage Tank
423.	28	28-T-430	Storage Tank
424.	28	28-T-431	Storage Tank
425.	28	28-T-432	Storage Tank
426.	28	28-T-433	Storage Tank
427.	28	28-T-434	Storage Tank
428.	28	28-T-435	Storage Tank
429.	28	28-T-436	Storage Tank
430.	28	28-T-437	Storage Tank
431.	29	29-DS-1	Draw Scale



#	Building or Location	Equipment Number	Equipment Type
432.	29	29-DS-2	Draw Scale
433.	29	29-DS-3	Draw Scale
434.	29	29-SS-7	Solvent Sink (cold cleaner)
435.	29	29-SS-8	Solvent Sink (cold cleaner)
436.	29	29-T-101	Process Tank
437.	29	29-T-102	Process Tank
438.	29	29-T-103	Process Tank
439.	29	29-T-104	Process Tank
440.	29	29-T-105	Process Tank
441.	29	29-T-106	Process Tank
442.	29	29-T-107	Process Tank
443.	29	29-T-108	Process Tank
444.	29	29-T-109	Process Tank
445.	29	29-T-110	Process Tank
446.	29	29-T-111	Process Tank



#	Building or Location	Equipment Number	Equipment Type
447.	29	29-T-112	Process Tank
448.	29	29-T-113	Process Tank
449.	29	29-T-114	Process Tank
450.	29	29-T-115	Process Tank
451.	29	29-T-116	Process Tank
452.	29	29-T-117	Process Tank
453.	29	29-T-118	Process Tank
454.	29	29-T-119	Process Tank
455.	29	29-T-120	Process Tank
456.	29	29-T-121	Process Tank
457.	29	29-T-122	Process Tank
458.	29	29-T-123	Process Tank
459.	29	29-T-124	Process Tank
460.	29	29-T-125	Process Tank
461.	29	29-T-126	Process Tank



#	Building or Location	Equipment Number	Equipment Type
462.	29	29-T-127	Process Tank
463.	29	29-T-128	Process Tank
464.	29	29-T-129	Process Tank
465.	29	29-T-130	Process Tank
466.	29	29-T-131	Process Tank
467.	29	29-T-132	Process Tank
468.	29	29-T-133	Process Tank
469.	29	29-T-134	Process Tank
470.	29	29-T-135	Process Tank
471.	29	29-T-138	Process Tank
472.	29	29-T-139	Process Tank
473.	29	29-T-140	Process Tank
474.	32	32-T-101	Storage Tank
475.	32	32-T-102	Storage Tank
476.	32	32-T-103	Storage Tank



#	Building or Location	Equipment Number	Equipment Type
477.	32	32-T-104	Storage Tank
478.	32	32-T-105	Storage Tank
479.	32	32-T-106	Storage Tank
480.	32	32-T-107	Storage Tank
481.	32	32-T-108	Storage Tank
482.	32	32-T-109	Storage Tank
483.	32	32-T-110	Storage Tank
484.	32	32-T-111	Storage Tank
485.	32	32-T-112	Storage Tank
486.	32	32-T-000	Emergency Flow Tank
487.	37	37-T-301	Storage Tank
488.	37	37-T-302	Storage Tank
489.	37	37-T-303	Storage Tank
490.	37	37-T-304	Storage Tank
491.	37	37-T-306	Storage Tank



Table 3: Paint Manufacturing Operations Emissions Units (P201)			
#	Building or Location	Equipment Number	Equipment Type
492.	38	38-T-307	Storage Tank
493.	38	38-T-308	Storage Tank
494.	38	38-T-309	Storage Tank
495.	38	38-T-310	Storage Tank
496.	38	38-T-311	Storage Tank
497.	38	38-T-312	Storage Tank
498.	39	39-T-313	Storage Tank
499.	39	39-T-314	Storage Tank
500.	39	39-T-315	Storage Tank
501.	39	39-T-316	Storage Tank
502.	39	39-T-317	Storage Tank
503.	39	39-T-318	Storage Tank
504.	41	41-CO-1	Waste Compactor
505.	41	41-SH-1	Waste Shredder



Table 3: Paint Manufacturing Operations Emissions Units (P201)			
#	Building or Location	Equipment Number	Equipment Type
506.	41	41-T-1	Storage Tank - less than 10,000-gallons; storing material less than 1.5 psia vapor pressure
507.	41	41-T-2	Storage Tank - less than 10,000-gallons; storing material less than 1.5 psia vapor pressure
508.	41	41-T-3	Storage Tank - less than 10,000-gallons; storing material less than 1.5 psia vapor pressure
509.	41	41-T-4	Storage Tank
510.	41	41-TC-1	Trash Compactor
511.	44	44-HW-1	Hot Water Tank - less than 10MMBtu/hr
512.	44	44-HW-2	Hot Water Tank - less than 10MMBtu/hr
513.	47	47-L-1	Thin Film Evaporator
514.	47	47-L-2	Thin Film Evaporator
515.	47	47-M-1	Mixer
516.	47	47-R-1	Thin Film Evaporator
517.	47	47-SS-9	Solvent Sink (cold cleaner)
518.	47	47-T-1	Process Distillation



Table 3: Paint Manufacturing Operations Emissions Units (P201)			
#	Building or Location	Equipment Number	Equipment Type
519.	47	47-T-2	Process Distillation
520.	47	47-T-3	Process Distillation
521.	47	47-T-4	Process Distillation
522.	47	47-T-5	Process Distillation
523.	50	50-B-1	Boiler - less than 10MMBtu/hr
524.	50	50-P-1	Fire Water Pump - less than 10MMBtu/hr, operated less than 500hours/yr
525.	50	50-T-1	Storage Tank - less than 700-gallons
526.	50	50-T-2	Storage Tank - less than 700- gallons
527.	52	52-D90-1	Mill (75 hp)
528.	52	52-D90-2	Mill (75 hp)
529.	52	52-D90-3	Mill (75 hp)
530.	52	52-D90-4	Mill (75 hp)
531.	52	52-D90-5	Mill (75 hp)
532.	52	52-S90-6	Mill (75 hp)



Table 3: Paint Manufacturing Operations Emissions Units (P201)			
#	Building or Location	Equipment Number	Equipment Type
533.	52	52-T-901	Clear-coat blend tank (8,000 gal)
534.	52	52-T-903	Clear-coat blend tank (8,000 gal)
535.	52	52-T-904	Clear-coat blend tank (8,000 gal)
536.	52	52-T-905	Clear-coat blend tank (8,000 gal)
537.	52	52-T-906	Water/solvent blend tank (8,000 gal)
538.	52	52-T-907	Water/solvent blend tank (8,000 gal)
539.	52	52-T-908	Water/solvent blend tank (8,000 gal)
540.	52	52-T-909	Water/solvent blend tank (8,000 gal)
541.	52	52-T-910	Water/solvent blend tank (8,000 gal)
542.	52	52-T-911	Water/solvent blend tank (8,000 gal)
543.	52	52-T-912	Water/solvent blend tank (8,000 gal)
544.	52	52-T-913	Water/solvent blend tank (8,000 gal)
545.	52	52-T-914	Water/solvent blend tank (8,000 gal)
546.	52	52-T-915	Water/solvent blend tank (8,000 gal)
547.	52	52-T-920	Premix tank (2,400 gal)



Table 3: Paint Manufacturing Operations Emissions Units (P201)			
#	Building or Location	Equipment Number	Equipment Type
548.	52	52-T-921	Premix tank (2,400 gal)
549.	52	52-T-922	Premix tank (1,100 gal)
550.	52	52-T-923	Premix tank (2,400 gal)
551.	52	52-T-924	Premix tank (2,400 gal)
552.	52	52-T-925	Premix tank (2,400 gal)
553.	52	52-T-926	Premix tank (2,400 gal)
554.	52	52-T-928	Premix tank (1,100 gal)
555.	52	52-T-940	Milling tank (2,400 gal)
556.	52	52-T-941	Milling tank (2,400 gal)
557.	52	52-T-942	Milling tank (2,400 gal)
558.	52	52-T-943	Milling tank (2,400 gal)
559.	52	52-T-944	Milling tank (2,400 gal)
560.	52	52-T-945	Milling tank (2,400 gal)
561.	52	52-T-950	Milling hold tank (4,000 gal)
562.	52	52-T-951	Milling hold tank (4,000 gal)



Table 3: Paint Manufacturing Operations Emissions Units (P201)			
#	Building or Location	Equipment Number	Equipment Type
563.	100	100-DM-1	Dispense Machine
564.	100	100-DM-2	Dispensing Machine
565.	100	100-LB-1	Lab Bench
566.	100	100-SS-10	Solvent Sink (cold cleaner)
567.	100	100-S15-7	Premier Mill
568.	100	100-D90-4	Premier Mill
569.	100	100-D90-5	Premier Mill
570.	100	100-S45-6	Premier Mill
571.	100	100-S45-7	Premier Mill
572.	100	100-S45-10	Single Premier Mill
573.	100	100-RM-01	Rail Mixer
574.	100	100-RM-02	Rail Mixer
575.	100	100-RM-03	Rail Mixer
576.	100	100-RM-04	Rail Mixer
577.	100	100-RM-05	Rail Mixer



#	Building or Location	Equipment Number	Equipment Type
578.	100	100-RM-06	Rail Mixer
579.	100	100-RM-07	Rail Mixer
580.	100	100-RM-08	Rail Mixer
581.	100	100-T-6001	Storage Tank
582.	100	100-T-6002	Storage Tank
583.	100	100-T-6003	Storage Tank
584.	100	100-T-6004	Storage Tank
585.	100	100-T-6005	Storage Tank
586.	100	100-T-6006	Storage Tank
587.	100	100-T-6007	Storage Tank
588.	100	100-T-6008	Storage Tank
589.	100	100-T-6009	Storage Tank
590.	100	100-T-6010	Storage Tank
591.	100	100-T-6011	Storage Tank
592.	100	100-T-6012	Storage Tank



#	Building or Location	Equipment Number	Equipment Type
593.	101	101-A-1	Agitator
594.	101	101-A-2	Agitator
595.	101	101-D90-6	Dual Premier Mill
596.	101	101-D90-7	Dual Premier Mill
597.	101	101-S200-1	Single Premier Mill
598.	101	101-S50-1	Singe Premier Mill
599.	101	101-S50-2	Single Premier Mill
600.	101	101-T-700	Process Tank
601.	101	101-T-701	Process Tank
602.	101	101-T-710	Paste Tank
603.	101	101-T-711	Paste Tank
604.	101	101-T-712	Paste Tank
605.	101	101-T-713	Paste Tank
606.	101	101-T-714	Paste Tank
607.	101	101-T-730	Blend Tank



#	Building or Location	Equipment Number	Equipment Type
608.	101	101-T-731	Blend Tank
609.	101	101-T-732	Blend Tank
610.	101	101-T-733	Blend Tank
611.	101	101-T-734	Blend Tank
612.	101	101-T-735	Blend Tank
613.	101	101-T-736	Blend Tank
614.	101	101-T-737	Blend Tank
615.	101	101-T-750	Waste Water Tank
616.	200	200-H-1	Heater - less than 10MMBtu/hr
617.	200	200-H-2	Heater - less than 10MMBtu/hr
618.	200	200-H-3	Heater - less than 10MMBtu/hr
619.	200	200-H-4	Heater - less than 10MMBtu/hr
620.	200	200-H-5	Heater - less than 10MMBtu/hr
621.	200	200-H-6	Heater - less than 10MMBtu/hr
622.	200	200-H-7	Heater - less than 10MMBtu/hr



Table 3: Paint Manufacturing Operations Emissions Units (P201)			
#	Building or Location	Equipment Number	Equipment Type
623.	200	200-H-8	Heater - less than 10MMBtu/hr
624.	200	200-H-9	Heater - less than 10MMBtu/hr
625.	205	205-H-1	Heater - less than 10MMBtu/hr
626.	205	205-H-2	Heater - less than 10MMBtu/hr
627.	300	300-H-1	Heater - less than 10MMBtu/hr
628.	300	300-H-2	Heater - less than 10MMBtu/hr
629.	300	300-H-3	Heater - less than 10MMBtu/hr
630.	300	300-H-4	Heater - less than 10MMBtu/hr
631.	300	300-H-5	Heater - less than 10MMBtu/hr
632.	300	300-H-6	Heater - less than 10MMBtu/hr
633.	300	300-H-7	Heater - less than 10MMBtu/hr
634.	300	300-H-8	Heater - less than 10MMBtu/hr
635.	300	300-H-9	Heater - less than 10MMBtu/hr
636.	500	500-H-1	Heater - less than 10MMBtu/hr
637.	600	600-B-1	Boiler - less than 10MMBtu/hr



Table 3: Paint Manufacturing Operations Emissions Units (P201)			
#	Building or Location	Equipment Number	Equipment Type
638.	600	600-H-01	Heater - less than 10MMBtu/hr
639.	600	600-H-02	Heater - less than 10MMBtu/hr
640.	600	600-H-03	Heater - less than 10MMBtu/hr
641.	600	600-H-04	Heater - less than 10MMBtu/hr
642.	600	600-H-05	Heater - less than 10MMBtu/hr
643.	600	600-H-06	Heater - less than 10MMBtu/hr
644.	600	600-H-07	Heater - less than 10MMBtu/hr
645.	600	600-H-08	Heater - less than 10MMBtu/hr
646.	600	600-LA-1	Liquid Preassembly
647.	600	600-P-1	Fire Water Pump - less than 10MMBtu/hr, less than 500 hours
648.	600	600-PA-1	Pigment Preassembly
649.	600	600-SS-1	Solvent Sink (cold cleaner)
650.	600	600-T-1	Storage Tank
651.	Backup	BACK-B-1	Generator Backup - less than 10MMBtu/hr



Table 3: Paint Manufacturing Operations Emissions Units (P201)			
#	Building or Location	Equipment Number	Equipment Type
652.	Fuel Oil	FUEL-T-003	Storage Tank - less than 700 gallons
653.	Fuel Oil	FUEL-T-319	Storage Tank
654.	Fuel Oil	FUEL-T-320	Storage Tank
655.	PFV	Flanges 100% VOC	External Flanges
656.	PFV	Flanges 47% VOC	External Flanges
657.	PFV	Pumps 100% VOC	External Pumps
658.	PFV	Pumps 47% VOC	External Pumps
659.	PFV	Valves 100% VOC	External Valves
660.	PFV	Valves 47% VOC	External Valves
661.	Snow Melter	SNOW-B-1	Snow Melter
662.	Snow Melter	SNOW-T-1	Storage Tank
663.	Training Trailer	TT-H-1	Boiler - less than 10MMBtu/hr
664.	Training Trailer	TT-H-2	Boiler - less than 10MMBtu/hr



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Table 3: Paint Manufacturing Operations Emissions Units (P201)			
#	Building or Location	Equipment Number	Equipment Type
665.		Paint Manufacturing Operations	635 light service valves
666.		Paint Manufacturing Operations	840 light liquid service flanges (connectors)
667.		Paint Manufacturing Operations	120 light liquid service pump seals



Table 4: Dedicated Waterbased Paint Production Equipment (P202)

As specified in OAC rule 3745-21-09(MM)(1), the paint manufacturing operations under OAC rule 3745-21-09(MM)(2) include the following equipment for the processing or use of solvent based or waterbased paint materials: mixing tanks for paint liquids and pigments, grinding mills, paint thinning and tinting tanks, paint filling equipment for shipping containers, cleaning equipment for paint processing equipment, and recovery equipment for the cleaning solvents.

Table 4: Dedicated Waterbased Paint Production Equipment (P202)			
#	Building or Location	Equipment Number	Equipment Type
1.	21	21-DS-1	Draw Scale
2.	21	21-SS-4	Solvent Sink (cold cleaner)
3.	22	22-T-49	Process Tank
4.	22	22-T-50	Process Tank
5.	22	22-T-51	Process Tank
6.	22	22-T-52	Process Tank
7.	22	22-T-53	Process Tank
8.	22	22-T-54	Process Tank
9.	22	22-T-55	Process Tank
10.	22	22-T-56	Process Tank
11.	22	22-T-57	Process Tank



#	Building or Location	Equipment Number	Equipment Type
12.	22	22-T-58	Storage Tank
13.	22	22-T-59	Storage Tank
14.	22	22-T-60	Storage Tank
15.	22	22-T-61	Process tank
16.	22	22-T-62	Process tank
17.	22	22-T-63	Process Tank
18.	22	22-T-64	Storage Tank
19.	22	22-T-65	Storage Tank
20.	22	22-T-66	Storage Tank
21.	22	22-T-67	Process Tank
22.	22	22-T-68	Storage Tank
23.	22	22-T-70	Storage Tank
24.	22	22-T-71	Process Tank
25.	22	22-T-72	Process Tank
26.	22	22-T-73	Process Tank



Table 4: Dedicated Waterbased Paint Production Equipment (P202)			
#	Building or Location	Equipment Number	Equipment Type
27.	22	22-T-74	Process Tank
28.	22	22-T-75	Water Storage Tank
29.	22	22-O-7	Lab Oven
30.	22	22-O-8	Lab Oven
31.	22	22-O-9	Lab Oven
32.	22	22-O-10	Lab Oven
33.	22	22-O-11	Lab Oven
34.	22B Tech	22B-MF-2	Isotemp Oven
35.	22B Tech	22B-CO-1	Convention Oven
36.	22B Tech	22B-CO-2	Convention Oven
37.	22B Tech	22B-MF-1	Isotemp Oven
38.	22B Tech	22B-O-1	Lab Oven
39.	22B Tech	22B-O-2	Lab Oven
40.	22B Tech	22B-O-11	Lab Oven
41.	22B Tech	22B-O-4	Lab Oven



Table 4: Dedicated Waterbased Paint Production Equipment (P202)			
#	Building or Location	Equipment Number	Equipment Type
42.	22B Tech	22B-O-3	Heat Age Oven
43.	22B Tech	22B-O-8	Isotemp Oven
44.	22B Tech	22B-O-5	Lab Oven
45.	22B Tech	22B-O-6	Lab Oven
46.	22B Tech	22B-O-7	Isopemp Oven
47.	22B Tech	22B-FH-1	Lab Fume Hood
48.	22B Tech	22B-FH-2	Lab Fume Hood
49.	22B Tech	22B-FH-3	Lab Fume Hood
50.	22B Tech	22B-FH-4	Lab Fume Hood
51.	22B Tech	22B-FH-5	Lab Fume Hood
52.	22B Tech	22B-FH-6	Lab Fume Hood
53.	22B tech	22B-FH-7	Lab Fume Hood
54.	22B	22B-T-1	Storage Tank
55.	22B	22B-T-2	Storage Tank
56.	22B	22B-T-3	Storage Tank



#	Building or Location	Equipment Number	Equipment Type
57.	22B	22B-T-4	Storage Tank
58.	22F	22F-0-PL	Pilot Lab Oven
59.	22F	22F-O-TO	Small Test Oven
60.	22F	22F-CT-01	Cleaning Tank
61.	22F	22F-CT-02	Cleaning Tank
62.	22F	22F-CT-03	Cleaning Tank
63.	22F	22F-CT-04	Cleaning Tank
64.	22F	22F-CT-05	Cleaning Tank
65.	22F	22F-CT-06	Cleaning Tank
66.	22F	22F-CT-07	Cleaning Tank
67.	22F	22F-CT-08	Cleaning Tank
68.	22F	22F-CT-09	Cleaning Tank
69.	22F	22F-CT-10	Cleaning Tank
70.	22F	22F-CT-11	Cleaning Tank
71.	22F	22F-CT-12	Cleaning Tank



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Table 4: Dedicated Waterbased Paint Production Equipment (P202)			
#	Building or Location	Equipment Number	Equipment Type
72.	22F	22F-CT-13	Cleaning Tank
73.	22F	22F-CT-14	Cleaning Tank
74.	22F	22F-CT-15	Cleaning Tank