



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

Lazarus Gov.  
Center

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

**CERTIFIED MAIL**

**Application No: 13-03614**

**DATE: 2/16/00**

Dorn Color Inc  
Bill Roblin  
11555 Berea Rd  
Cleveland, OH 44102

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$400** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

Thomas G. Rigo, Manager  
Field Operations and Permit Section  
Division of Air Pollution Control

CC: USEPA  
Pennsylvania

CBAPC



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Permit To Install  
Terms and Conditions**

**Issue Date: To be entered upon final issuance  
Effective Date: To be entered upon final issuance**

**DRAFT PERMIT TO INSTALL 13-03614**

Application Number: 13-03614  
APS Premise Number: 1318008227  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: Dorn Color Inc  
Person to Contact: Bill Roblin  
Address: 11555 Berea Rd  
Cleveland, OH 44102

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**11555 Berea Rd  
Cleveland, Ohio**

Description of proposed emissions unit(s):  
**1-continuous paper web coating line with catalytic incinerator and hand spray booth.**

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

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Director

**Dorn Color Inc**  
**PTI Application: 13-03614**

**Facility ID: 1318008227**

**Issued: To be entered upon final issuance**

## **Part I - GENERAL TERMS AND CONDITIONS**

### **A. Permit to Install General Terms and Conditions**

#### **1. Compliance Requirements**

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

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

The permittee shall submit required reports in the following manner:

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

#### **3. Records Retention Requirements**

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

#### **4. 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

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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.

**5. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. 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).

**6. Permit Transfers**

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

**7. 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.

**8. Termination of Permit to Install**

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

**9. Construction of New Sources(s)**

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may

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lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities prove to be inadequate or cannot meet applicable standards.

**10. Public Disclosure**

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

**11. Applicability**

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit to Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

**12. Best Available Technology**

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

**13. Source Operation and Operating Permit Requirements After Completion of Construction**

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the emissions unit(s) covered by this permit.

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**14. Construction Compliance Certification**

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

**15. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

**B. Permit to Install Summary of Allowable Emissions**

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	13.36
OC	7.43

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**Dorn Color Inc**  
**PTI Application 12-02-14**  
**Issue**

**Facility ID: 1318008227**

Emissions Unit ID: **K001**

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Continuous web coating line with catalytic incinerator	OAC rule 3745-31-05 (A)(3)	<p>Volatile Organic Compound (VOC) emissions from coating and cleanup/lacquer thinner shall not exceed 3.05 lbs/hr and 13.36 tpy. See A.2.a.</p> <p>For units K001 and K002 combined: Combined HAPs emissions shall not exceed 9.3 tpy</p>
	OAC rule 3745-21-09 (F)	VOC content shall not exceed 2.9 lbs/gal, excluding water and exempt solvents.
	OAC rule 3745-21-09 (B)(6)	In Lieu of complying with 21-09 (F), a catalytic incinerator shall be employed and provide an overall reduction of 81%, by weight; and the control efficiency must be at least 90%.
	OAC rule 3745-35-07 (B) Synthetic minor to avoid Title V.	A catalytic incinerator must be employed full-time during the operation of unit K001. See sections A.2.a, C.2, C.3, and D.2 below.

**2. Additional Terms and Conditions**

**Dorn**

**PTI /**

Emissions Unit ID: **K001**

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- 2.a** Use of a catalytic incinerator with an overall reduction of 81%, by weight and control efficiency of at least 90%.

**Dorn**

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Emissions Unit ID: **K001**

**B. Operational Restrictions**

None.

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information each month for the line:
  - a. The name and identification number of each coating, as applied.
  - b. The VOC content of each coating, excluding water and exempt solvents, as applied.
  - c. The amount of each coating employed in gallons.
2. The permittee shall operate and maintain continuous temperature monitors and recorder(s) which measure and record(s) the temperature immediately upstream and downstream of the incinerator's catalyst bed when the emissions unit is in operation. Unit shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorder(s) shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary the permittee.

The permittee shall collect and record the following information for each day for the control equipment:

- a. A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
  - b. All 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance.
  - c. All 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent performance test that demonstrated the emissions unit was in compliance.
3. The permittee shall collect and record the following information each month:

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Emissions Unit ID: **K001**

- a. The name and identification number of each coating, as applied.
- b. The individual Hazardous Air Pollutant (HAP) content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied.
- c. The total combined Hazardous Air Pollutant (HAP) content for each HAP of each coating in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from b).
- d. The number of gallons of each coating employed.
- e. The name and identification of each cleanup material employed.
- f. The individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon of cleanup material, as applied.
- g. The total combined HAP content of each cleanup material in pounds of combined HAPs per gallon of cleanup material, as applied (sum all the individual HAP contents from f).
- h. The number of gallons of each cleanup material employed.
- i. The total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling 12 month period (for each HAP the sum of b times d for each coating and the sum of f times h for each cleanup material).
- j. The total combined Hazardous Air Pollutant (HAP) emissions from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling 12 month period (the sum of c times d for each coating plus the sum of g times h for each cleanup material).

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

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall submit quarterly summaries of the following records:

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- a. A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
- b. All 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance.
- c. All 3-hour blocks of time (when the emissions unit was in operation during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference of the bed during the most recent performance test that demonstrated the emissions unit was in compliance.

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

3. The permittee shall notify the Director of any monthly record showing any deviation from the following:
  - a. An identification of all months during which the Hazardous Air Pollutant (HAP) content limitation(s) were exceeded (pound of individual HAP per gallon of coating or pound of combined HAP per gallon of coating limitations).
  - b. The total individual HAP emissions limitation for each HAP from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per year.
  - c. The total combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per year.

These reports shall include a description of the deviation, as well as the corrective actions that were taken to achieve compliance. The permittee shall submit annual reports which identify all exceedances of the above limitations, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year.

**E. Testing Requirements**

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



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Emissions Unit ID: **K001**

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Applicable Compliance Method:

Determined in accordance with OAC rule 3745-21-04 paragraphs B and C.

c. Emission Limitation:

Combined HAPs emissions shall not exceed 9.3 tpy.

Applicable Compliance Method:

Compliance with the emissions limitations shall be determined pursuant to the monitoring and record keeping. At the request of the Ohio EPA, compliance shall be determined by USEPA Method 24. Also, compliance shall be demonstrated with the following equations:

Coating:  $\text{Coating usage (gal/hr)} \times \text{HAP content (lbs/gal)} \times \text{hrs/yr}$

Cleanup/Lacquer Thinner:  $\text{Cleanup/Thinner usage (gal/day)} \times \text{cleanup/thinner content (lbs/gal)} \times \text{evaporation (\%)} \times \text{HAP content (\%)} \times \text{days/yr}$

d. Emission Limitation:

3.05 lbs/hr and 13.36 tpy VOC emission limit for coating application and cleanup.

Applicable Compliance Method:

Compliance shall be demonstrated by calculating the worst case hourly emissions (lbs/gal VOC coating content times maximum gallons employed). Hour by hour calculations are not necessary as long as the worst case hourly calculation shows compliance. Multiplying the worst case hourly emissions by the hours per year and the overall control efficiency will demonstrate compliance with the tons per year limit.

**F. Miscellaneous Requirements**

This permit allows the use of the coatings and cleanup materials specified by the permittee in the application for PTI number 13-3614. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the toluene, MIK, and xylene emissions limitations specified in this permit were established in accordance with the Ohio EPA's "Air Toxics Policy" and are based on both the coating and cleanup material formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the Screen 3 model and a comparison of the predicted 1 hour maximum

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ground-level concentration to the MAGLC. The following summarizes the results of the modeling for each pollutant:

Pollutant: Toluene

TLV (ug/m3): 188,000

Maximum Hourly Emission Rate (lbs/hr): 2.09

Predicted 1 Hour Maximum Ground-Level Concentration at the Fence Line (ug/m3): 272.7

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 4476.19

Pollutant: MIK

TLV (ug/m3): 205,000

Maximum Hourly Emission Rate (lbs/hr): 0.006

Predicted 1 Hour Maximum Ground-Level Concentration at the Fence Line (ug/m3): 1.05

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 4880.95

Pollutant: Xylene

TLV (ug/m3): 434,000

Maximum Hourly Emission Rate (lbs/hr): 0.003

Predicted 1 Hour Maximum Ground-Level Concentration at the Fence Line (ug/m3): 0.31

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 10333.33

Any of the following changes may be deemed a "modification" to the emissions unit and, as such, prior notification to and approval from the appropriate Ohio EPA District Office or local air agency are required, including the possible issuance of modifications to PTI number 13-3614 and the operating permit:

- a. Any changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup materials, that would result in the emissions of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH), " than the lowest TLV value specified in the above table.
- b. Any change to the emissions unit or its exhaust parameters (e.g ., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of any MAGLC specified in the above table.
- c. A reduction in the TLV by the ACGIH for any of the coatings and cleanup materials that, at the maximum hourly emission rate specified in the above table, would result in an exceedance of the new MAGLC.

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- d. Any change to the emission unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01.
- e. Any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in the emission of any of the exempted organic compounds included in the definition of "OC" [OAC rule 3745-21-01 (B)(6)].
- f. Any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in an increase in emissions of any "Hazardous Air Pollutants" (HAPs) as defined in OAC rule 3745-77-01 (V).

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PTI**

Emissions Unit ID: **K002**

**Issued: To be entered upon final issuance**

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)[continued]**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Hand spray booth	OAC rule 3745-31-05 (A)(3)	Organic Compound (OC) emissions shall not exceed 8 lbs/hr and 40 lbs/day. Organic Compound (OC) emissions shall not exceed 7.3 tpy.  Organic Compound (OC) emissions from the cleanup/lacquer thinner shall not exceed 0.12 lbs/hr and 0.13 tpy. The permittee shall not use photochemically reactive materials for cleanup.  For units K001 and K002 combined: Combined HAPs emissions shall not exceed 9.3 tpy.
	OAC rule 3745-21-07 (G)(2)	Equivalent to OAC rule 3745-31-05(A)(3)

**2. Additional Terms and Conditions**

**2.a** None

**B. Operational Restrictions**

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Emissions Unit ID: **K002**

None

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

1. The permittee shall collect and record the following information for each day for the coating operation:
  - a. The company identification for each coating and photochemically reactive cleanup material employed.
  - b. The number of gallons of each coating and photochemically reactive cleanup material employed.
  - c. The organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon.
  - d. The total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day.
  - e. The total number of hours the emissions unit was in operation.
  - f. The average hourly organic compound emission rate for all coatings and photochemically reactive cleanup materials, i.e., (d)/(e), in pounds per hour (average).
2. The permittee shall collect and record the following information each month:
  - a. The name and identification number of each coating, as applied.
  - b. The individual Hazardous Air Pollutant (HAP) content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied.
  - c. The total combined Hazardous Air Pollutant (HAP) content for each HAP of each coating in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from b).
  - d. The number of gallons of each coating employed.
  - e. The name and identification of each cleanup material employed.
  - f. The individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon of cleanup material, as applied.

- g. The total combined HAP content of each cleanup material in pounds of combined HAPs per gallon of cleanup material, as applied (sum all the individual HAP contents from f).
  - h. The number of gallons of each cleanup material employed.
  - i. The total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling 12 month period (for each HAP the sum of b times d for each coating and the sum of f times h for each cleanup material).
  - j. The total combined Hazardous Air Pollutant (HAP) emissions from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling 12 month period (the sum of c times d for each coating plus the sum of g times h for each cleanup material).
3. The permittee shall collect and record the following information each month:
- a. The name and identification number of each coating, as applied.
  - b. The individual Hazardous Air Pollutant (HAP) content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied.
  - c. The total combined Hazardous Air Pollutant (HAP) content for each HAP of each coating in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from b).
  - d. The number of gallons of each coating employed.
  - e. The name and identification of each cleanup material employed.
  - f. The individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon of cleanup material, as applied.
  - g. The total combined HAP content of each cleanup material in pounds of combined HAPs per gallon of cleanup material, as applied (sum all the individual HAP contents from f).
  - h. The number of gallons of each cleanup material employed.
  - i. The total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling 12 month period (for each HAP the sum of b times d for each coating and the sum of f times h for each

**Dorn****PTI**Emissions Unit ID: **K002****Issued: To be entered upon final issuance**

cleanup material).

- j. The total combined Hazardous Air Pollutant (HAP) emissions from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling 12 month period (the sum of c times d for each coating plus the sum of g times h for each cleanup material).

**D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. An identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day.
  - b. An identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
2. The permittee shall notify the Director of any monthly record showing any deviation from the following:
  - a. An identification of all months during which the Hazardous Air Pollutant (HAP) content limitation(s) were exceeded (pound of individual HAP per gallon of coating or pound of combined HAP per gallon of coating limitations).
  - b. The total individual HAP emissions limitation for each HAP from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per year.
  - c. The total combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per year.

These reports shall include a description of the deviation, as well as the corrective actions that were taken to achieve compliance. The permittee shall submit annual reports which identify all exceedances of the above limitations, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year.

**Dorn**

**PTI /**

**Issued: To be entered upon final issuance**

Emissions Unit ID: **K002**

**E. Testing Requirements**

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

a. Emission Limitation:

8 lbs OC/hr, 40 lbs OC/day

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping. If required, the permittee shall use U.S. EPA Method 18, 25 or 25A, as appropriate.

**Dorn Color Inc**  
**PTI Application 13-3614**  
**Issue**

**Facility ID: 1318008227**

Emissions Unit ID: **K002**

b. Emission Limitation:

7.3 tpy OC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping determined above in section C above.

c. Emission Limitation:

0.12 lb/hr and 0.13 tpy VOC emission limit for cleanup/lacquer thinner.

Applicable Compliance Method:

Compliance shall be demonstrated by calculating the worst case hourly emissions (lbs/gal OC coating content times maximum gallons employed). Hour by hour calculations are not necessary as long as the worst case hourly calculation shows compliance. Multiplying the worst case hourly emissions by the hours per year will demonstrate compliance with the tons per year limit.

d. Emission Limitation:

Combined HAPs emissions shall not exceed 9.3 tpy.

Applicable Compliance Method:

Compliance with the emissions limitations shall be determined pursuant to the monitoring and record keeping. At the request of the Ohio EPA, compliance shall be determined by USEPA Method 24. Also, compliance shall be demonstrated with the following equations:

Coating:  $\text{Coating usage (gal/hr)} \times \text{HAP content (lbs/gal)} \times \text{hrs/yr}$

Cleanup/Lacquer Thinner:  $\text{Cleanup/Thinner usage (gal/day)} \times \text{cleanup/thinner content (lbs/gal)} \times \text{evaporation (\%)} \times \text{HAP content (\%)} \times \text{days/yr}$

**F. Miscellaneous Requirements**

This permit allows the use of the coatings and cleanup materials specified by the permittee in the application for PTI number 13-3614. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the toluene, MIK, and xylene emissions limitations specified in this permit were

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established in accordance with the Ohio EPA's "Air Toxics Policy" and are based on both the coating and cleanup material formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the Screen 3 model and a comparison of the predicted 1 hour maximum ground-level concentration to the MAGLC. The following summarizes the results of the modeling for each pollutant:

Pollutant: Toluene

TLV (ug/m3): 188,000

Maximum Hourly Emission Rate (lbs/hr): 0.06

Predicted 1 Hour Maximum Ground-Level Concentration at the Fence Line (ug/m3): 4.314

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 4476.19

Pollutant: MIK

TLV (ug/m3): 205,000

Maximum Hourly Emission Rate (lbs/hr): 0.03

Predicted 1 Hour Maximum Ground-Level Concentration at the Fence Line (ug/m3): 2.157

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 4880.95

Pollutant: Xylene

TLV (ug/m3): 434,000

Maximum Hourly Emission Rate (lbs/hr): 0.02

Predicted 1 Hour Maximum Ground-Level Concentration at the Fence Line (ug/m3): 2.157

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 10,333.33

Any of the following changes may be deemed a "modification" to the emissions unit and, as such, prior notification to and approval from the appropriate Ohio EPA District Office or local air agency are required, including the possible issuance of modifications to PTI number 13-3614 and the operating permit:

- a. Any changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup materials, that would result in the emissions of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH), " than the lowest TLV value specified in the above table.
- b. Any change to the emissions unit or its exhaust parameters (e.g ., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of any MAGLC specified in the above table.

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- c. A reduction in the TLV by the ACGIH for any of the coatings and cleanup materials that, at the maximum hourly emission rate specified in the above table, would result in an exceedance of the new MAGLC.
- d. Any change to the emission unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01.
- e. Any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in the emission of any of the exempted organic compounds included in the definition of "OC" [OAC rule 3745-21-01 (B)(6)].
- f. Any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in an increase in emissions of any "Hazardous Air Pollutants" (HAPs) as defined in OAC rule 3745-77-01 (V).