



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL CERTIFIED MAIL
CUYAHOGA COUNTY**

Street Address:

122 S. Front Street

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

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 13-03745

DATE: 12/28/2000

Pioneer Manufacturing Company
George Sajner
4529 Industrial Parkway
Cleveland, OH 44135

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

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

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

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

CC: USEPA

CBAPC



Permit To Install

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

FINAL PERMIT TO INSTALL 13-03745

Application Number: 13-03745
APS Premise Number: 1318007715
Permit Fee: **\$600**
Name of Facility: Pioneer Manufacturing Company
Person to Contact: George Sajner
Address: 4529 Industrial Parkway
Cleveland, OH 44135

Location of proposed air contaminant source(s) [emissions unit(s)]:
4529 Industrial Parkway
Cleveland, Ohio

Description of proposed emissions unit(s):
Latex paint manufacturing line.

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



Director

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 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 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.

Pioneer Manufacturing Company
PTI Application: 13-03745
Issued: 12/28/2000

Facility ID: 1318007715

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>
OC	4.6
PM	3.4

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

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>	
P901 - one 3,000 gallon closed disperser tank for latex paint blending, equipped with a dust collector. The maximum process weight rate is 6,610 lbs per hour.	OAC rule 3745-31-05(A)(3)	OAC rule 3745-17-07(B)(1)
		OAC rule 3745-21-07 (G)(2)
		OAC rule 3745-17-11 (B)
		OAC rule 3745-17-08 (B)
		OAC rule 3745-17-07(A)(1)

Applicable Emissions
Limitations/Control Measures

Organic Compound emissions
(OC): 1.06 lbs/hr and 4.6 tpy.

Particulate emissions (PE): 0.78
lbs/hr and 3.4 tpy

The requirements established
pursuant to this rule are equivalent
to the requirements of OAC rule
3745-17-07(A)(1) and OAC rule
3745-17-07(B)(1).

The emission limitation specified by
this rule is less stringent than the
emission limitation established
pursuant to OAC rule
3745-31-05(A)(3).

The emission limitation specified by
this rule is less stringent than the
emission limitation established
pursuant to OAC rule
3745-31-05(A)(3), see B.2

Visible particulate emissions any
stack shall not exceed 20 percent
opacity, as a 6-minute average,
except as provided by rule.

Visible particulate emissions of
fugitive dust from any building
outlet shall not exceed 20 percent
opacity, as a 3-minute average,
except as provided by rule. See
A.2.a

Exempt, see B.3.

2. Additional Terms and Conditions

- 2.a Any openings from the building (windows, doors, exhaust fans and etc.) shall be subject to fugitive dust emissions opacity limitation.

B. Operational Restrictions

1. The dust collector shall be operating at all times while this emissions unit is in operation.
2. Good housekeeping practices shall be employed to eliminate or minimize fugitive dust emissions.
3. Only non-photochemically reactive organic material formulations shall be blended.
4. The pressure drop across the baghouse shall be maintained within the range of 2 to 8 inches of water while the emissions unit is in operation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall keep the following information for this emissions unit each day:
 - a. The name and identification for each coating produced.
 - b. The total number of batches of each coating produced.
 - c. The name and the amount of materials used in each coating produced, in pounds.
 - d. The hours of operations.
 - e. The total average hourly OC emissions from all batches of coatings produced, to be defined as TAvGOC/hr and calculated as follows:
 - i. $\text{lbs OC/batch} \times \text{number of batches/day} = \text{lbs OC/day}$
 - ii. $\text{lbs OC/day} \times \text{EF}(\text{emission factor} = 0.01, \text{AP-42, section 5.10, 5/95}) = \text{lbs OC loss/day}$
 - iii. $\text{lbs OC loss/day} \times \text{day/number of hours} = \text{TavgOC/hr}$

Apply equation (i) to each OC employed and sum total all OC for each day. Multiply the sum total from equation (i) by 0.01 to obtain lbs OC loss/day and then divide by the hours of operations.

- f. The total average hourly particulate emissions from all batches of coatings produced, to be defined as TavgPM/hr and calculated as follows:
 - i. $\text{lbs solids/batch} \times \text{number of batches/day} \times 1 \text{ ton}/2,000 \text{ lbs} = \text{tons of solids/day}$
 - ii. $\text{tons of solids/day} \times \text{EF}(\text{emission factor} = 20 \text{ lbs/ton (uncontrolled), AP-42, section 5.10, 5/95}) = \text{lbs PM loss(uncontrolled)/day}$
 - iii. $\text{lbs PM loss(uncontrolled)/day} \times (1 - \text{DCEF}(\text{dust collector efficiency} = 0.99) - \text{FEF}(\text{fugitive emissions factor} = 0.005)) = \text{lbs PM loss(controlled)/day}$

iv. $\text{lbs PM loss(controlled)/day} \times \text{day/hours of operation} = \text{TavgPM/hr}$

Apply equation (i) to each all solid material employed and sum total all solid materials each day. Multiply the sum total from equation (i) by 20 lbs/ton to obtain lbs PM loss(uncontrolled). Multiply lbs PM loss(uncontrolled) by (1 - 0.985) and then divide by the hours of operations.

2. The permittee shall keep the following information for this emissions unit on an annual basis:
 - a. The annual OC emissions from all batches of coatings produced. It shall be calculated as follows:

Sum the daily emissions from the above equation, located in section C.1.e.(ii).
 - b. The annual particulate emissions from all batches of coatings produced. It shall be calculated as follows:

Sum the daily emissions from the above equation, located in section C.1.f.(iii).
3. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the average hourly emission limitation for OC. This written report shall be submitted to the Director (Cleveland Bureau of Air Pollution Control) within 30 days of the occurrence of the deviation.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the annual emission limitation for OC. This written report shall be submitted to the Director (Cleveland Bureau of Air Pollution Control) within 30 days of the occurrence of the deviation.
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the average hourly emission limitation for particulate emissions. This written report shall be submitted to the Director (Cleveland Bureau of Air Pollution Control) within 30 days of the occurrence of the deviation.
4. The permittee shall submit deviation (excursion) reports which identify all exceedances of the

Emissions Unit ID: **P901**

annual emission limitation for particulate emissions. This written report shall be submitted to the Director (Cleveland Bureau of Air Pollution Control) within 30 days of the occurrence of the deviation.

5. The permittee shall submit pressure drop deviation (excursion) reports that identify that all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. This written report shall be submitted to the Director (Cleveland Bureau of Air Pollution Control) within 30 days of the occurrence of the deviation.

E. Testing Requirements

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

- a. Emission Limitation:
1.06 lbs/hour OC

Applicable Compliance Method:

Compliance shall be determined based upon record keeping requirements specified in section C.1 of these terms and conditions.

- b. Emission Limitation:
4.6 tpy OC

Applicable Compliance Method:

Compliance shall be determined based upon record keeping requirements specified in section C.2 of these terms and conditions.

- c. Emission Limitation:
0.78 lbs/hr Particulate emissions

Applicable Compliance Method:

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

- d. Emission Limitation:
3.4 tpy Particulate emissions

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping requirements specified in section C.2 of these terms and conditions.

- e. Emission Limitation:
20 % opacity from any stack emissions, as a 6-minute average, except as provided by rule
- Applicable Compliance Method:
Compliance with the above visible emission limitation shall be determined using USEPA Method 9 of 40 CFR, Part 60, Appendix A.
- f. Emission Limitation:
20 % opacity from any fugitive dust emissions, as a 3-minute average, except as provided by rule
- Applicable Compliance Method:
Compliance with the above visible emission limitation shall be determined using USEPA Method 22 of 40 CFR, Part 60, Appendix A.

F. Miscellaneous Requirements

1. 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.

NEW SOURCE REVIEW FORM B

PTI Number: 13-03745 Facility ID: 1318007715

FACILITY NAME Pioneer Manufacturing Company

FACILITY DESCRIPTION Latex paint manufacturing line CITY/TWP Cleveland

SIC CODE 5087 SCC CODE 3-01-014-04 EMISSIONS UNIT ID P901

EMISSIONS UNIT DESCRIPTION one 3,000 gallon closed disperser tank equipped with dust collector

DATE INSTALLED 1/1/01

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter		0.78	0.33	0.78	3.4
PM ₁₀					
Sulfur Dioxide					
Organic Compounds		1.06	0.45	1.06	4.6
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

The BAT determination for this source consists of the use of a dust collector; therefore, limiting their allowable for PM to 0.52 lbs/hr and 2.3 tpy. The basis for this determination is the knowledge of the process and regulations governing it.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? NO

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES X NO

IDENTIFY THE AIR CONTAMINANTS: _____

NEW SOURCE REVIEW FORM B

PTI Number: 13-03745 Facility ID: 1318007715

FACILITY NAME Pioneer Manufacturing Company

FACILITY DESCRIPTION Latex paint manufacturing line CITY/TWP Cleveland

Ohio EPA Permit to Install Information Form Please describe below any documentation which is being submitted with this recommendation (must be sent the same day). Electronic items should be submitted with the e-mail transmitting the PTI terms, and in software that CO can utilize. If mailing any hard copy, this section must be printed as a cover page. All items must be clearly labeled indicating the PTI name and number. Submit **hard copy items to Pam McGraner**, AQM&P, DAPC, Central Office, and electronic files to **airpti@epa.state.oh.us**

Please fill out the following. If the checkbox does not work, replace it with an 'X'

	<u>Electronic</u>	<u>Additional information File Name Convention (your PTI # plus this letter)</u>	<u>Hard Copy</u>	<u>None</u>
<u>Calculations (required)</u>	<input checked="" type="checkbox"/>	1303745c.wpd	<input type="checkbox"/>	
<u>Modeling form/results</u>	<input type="checkbox"/>	0000000s.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>PTI Application (complete or partial)*</u>	<input type="checkbox"/>	0000000a.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>BAT Study</u>	<input type="checkbox"/>	0000000b.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>Other/misc.</u>	<input type="checkbox"/>	0000000t.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>

* Mandatory for netting, PSD, nonattainment NSR, 112(g), 21-07(G)(9)(g) and 21-09(U)(2)(f) - 2 complete copies.

Please complete (see comment bubble to the left for additional instructions):

NSR Discussion

This PTI is for a latex paint blending operation with a maximum PWR of 6,610 lbs per hour resulting in OC and PM emissions. No PSD, MACT or NSPS rules were applicable.

Please complete for these type permits (For PSD/NSR Permit, place mouse over this text):

Synthetic Minor Determination and/or **Netting Determination**
Permit To Install **ENTER PTI NUMBER HERE**

- A. Source Description
- B. Facility Emissions and Attainment Status
- C. Source Emissions
- D. Conclusion

PLEASE PROVIDE ADDITIONAL NOTES OR COMMENTS AS NECESSARY:

NONE

Please complete:

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

<u>Pollutant</u>	<u>Tons Per Year</u>
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PM	3.4

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