



5/1/2014

Peggy Russell  
Russell Products Co FCS Division  
275 N Forge St  
Akron, OH 44304

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 1677011129  
Permit Number: P0116297  
Permit Type: OAC Chapter 3745-31 Modification  
County: Summit

Certified Mail

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of 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 permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, Akron Beacon Journal. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall  
Permit Review/Development Section  
Ohio EPA, DAPC  
50 West Town Street Suite 700  
PO Box 1049  
Columbus, Ohio 43216-1049

and Akron Regional Air Quality Management District  
146 South High Street, Room 904  
Akron, OH 44308

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Akron Regional Air Quality Management District at (330)375-2480.

Sincerely,

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

Cc: U.S. EPA Region 5 Via E-Mail Notification  
ARAQMD; Pennsylvania; West Virginia; Canada



PUBLIC NOTICE

5/1/2014 Issuance of Draft Air Pollution Permit-To-Install and Operate

Russell Products Co FCS Division

275 N Forge St,  
Akron, OH 44304

Summit County

FACILITY DESC.: Urethane and Other Foam Product (except Polystyrene) Manufacturing

PERMIT #: P0116297

PERMIT TYPE: OAC Chapter 3745-31 Modification

PERMIT DESC: Chapter 31 modification FEPTIO of four (4) coating lines to allow for the coating of either metal parts or foam in each booth.

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the permit # or: Megan Talcott, Akron Regional Air Quality Management District, 146 South High Street, Room 904, Akron, OH 44308. Ph: (330)375-2480





## Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Russell Products Co. is a coating operation located in Summit County consisting of 10 coating lines and associated drying ovens. The coating lines coat miscellaneous metal parts and foam.

3. Facility Emissions and Attainment Status:

Russell Products Co. has a potential to emit over the major thresholds for volatile organic compounds (VOC), individual hazardous air pollutant (HAP) and combined HAPs. All other air pollutants are below Title V thresholds. Summit County is nonattainment for ozone and particulate matter less than 2.5 micron in diameter (PM<sub>2.5</sub>).

4. Source Emissions:

This permit will limit the facility-wide VOC, individual HAP and combined HAPs emissions to 79.9, 9.9 and 24.9 tons per rolling 12-month period, respectively. These limitations allow Russell Products Co. to avoid Title V permitting. The permittee has agreed to restrict coating usage for each emissions unit to a maximum of 2,060 gallons per rolling 12-month period. Compliance with these restrictions will be demonstrated through record keeping.

5. Conclusion:

By establishing operational restrictions on coating usage, Russell Products will limit emissions under the Title V thresholds. The record keeping and reporting requirements will ensure that the facility is in compliance with the emission limitations and operational restrictions.

6. Please provide additional notes or comments as necessary:

None

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	79.9
Individual HAP	9.9
Combined HAPs	24.9





**DRAFT**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
Russell Products Co FCS Division**

Facility ID:	1677011129
Permit Number:	P0116297
Permit Type:	OAC Chapter 3745-31 Modification
Issued:	5/1/2014
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance





**Division of Air Pollution Control**  
**Permit-to-Install and Operate**  
for  
Russell Products Co FCS Division

**Table of Contents**

Authorization .....	1
A. Standard Terms and Conditions .....	3
1. What does this permit-to-install and operate ("PTIO") allow me to do?.....	4
2. Who is responsible for complying with this permit? .....	4
3. What records must I keep under this permit? .....	4
4. What are my permit fees and when do I pay them?.....	4
5. When does my PTIO expire, and when do I need to submit my renewal application? .....	4
6. What happens to this permit if my project is delayed or I do not install or modify my source? .....	5
7. What reports must I submit under this permit? .....	5
8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit? .....	5
9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? ...	5
10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report? .....	6
11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located? .....	6
12. What happens if one or more emissions units operated under this permit is/are shut down permanently? .....	6
13. Can I transfer this permit to a new owner or operator?.....	7
14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"? .....	7
15. What happens if a portion of this permit is determined to be invalid? .....	7
B. Facility-Wide Terms and Conditions.....	8
C. Emissions Unit Terms and Conditions .....	10
1. Emissions Unit Group - Coating Lines 1: K001, K002, K003, K005, K007, K008.....	11
2. Emissions Unit Group - Coating Lines 2: K004, K006, K009, K010.....	18





**Draft Permit-to-Install and Operate**

Russell Products Co FCS Division

**Permit Number:** P0116297

**Facility ID:** 1677011129

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

## Authorization

Facility ID: 1677011129  
Application Number(s): A0049584  
Permit Number: P0116297  
Permit Description: Chapter 31 modification FEPTIO of four (4) coating lines to allow for the coating of either metal parts or foam in each booth.  
Permit Type: OAC Chapter 3745-31 Modification  
Permit Fee: \$2,000.00 *DO NOT send payment at this time, subject to change before final issuance*  
Issue Date: 5/1/2014  
Effective Date: To be entered upon final issuance  
Expiration Date: To be entered upon final issuance  
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

Russell Products Co FCS Division  
275 N Forge St  
Akron, OH 44304

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

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

Akron Regional Air Quality Management District  
146 South High Street, Room 904  
Akron, OH 44308  
(330)375-2480

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and Federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler  
Director



## Authorization (continued)

Permit Number: P0116297  
Permit Description: Chapter 31 modification FEPTIO of four (4) coating lines to allow for the coating of either metal parts or foam in each booth.

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

### Group Name: Coating Lines 1

<b>Emissions Unit ID:</b>	<b>K001</b>
Company Equipment ID:	vinyl coating of urethane foam
Superseded Permit Number:	16-02082
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K002</b>
Company Equipment ID:	Booth 2
Superseded Permit Number:	16-02155
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K003</b>
Company Equipment ID:	Booth 3
Superseded Permit Number:	16-02155
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K005</b>
Company Equipment ID:	Booth 5
Superseded Permit Number:	16-02481
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K007</b>
Company Equipment ID:	K007
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K008</b>
Company Equipment ID:	K008
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

### Group Name: Coating Lines 2

<b>Emissions Unit ID:</b>	<b>K004</b>
Company Equipment ID:	Booth 4
Superseded Permit Number:	16-02155
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K006</b>
Company Equipment ID:	R006
Superseded Permit Number:	16-02481
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K009</b>
Company Equipment ID:	K009
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K010</b>
Company Equipment ID:	K010
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



**Draft Permit-to-Install and Operate**

Russell Products Co FCS Division

**Permit Number:** P0116297

**Facility ID:** 1677011129

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

## **A. Standard Terms and Conditions**



**1. What does this permit-to-install and operate ("PTIO") allow me to do?**

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

**2. Who is responsible for complying with this permit?**

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

**3. What records must I keep under this permit?**

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

**4. What are my permit fees and when do I pay them?**

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

**5. When does my PTIO expire, and when do I need to submit my renewal application?**

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is



very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

**6. What happens to this permit if my project is delayed or I do not install or modify my source?**

This PTIO expires 18 months after the issue date identified on the “Authorization” page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

**7. What reports must I submit under this permit?**

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

**8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?**

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions of this permit will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

**9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?**

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.



**10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?**

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Akron Regional Air Quality Management District in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

**11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?**

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

**12. What happens if one or more emissions units operated under this permit is/are shut down permanently?**

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

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

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

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



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

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

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

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

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

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



**Draft Permit-to-Install and Operate**

Russell Products Co FCS Division

**Permit Number:** P0116297

**Facility ID:** 1677011129

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

## **B. Facility-Wide Terms and Conditions**



**Draft Permit-to-Install and Operate**

Russell Products Co FCS Division

**Permit Number:** P0116297

**Facility ID:** 1677011129

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

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



**Draft Permit-to-Install and Operate**

Russell Products Co FCS Division

**Permit Number:** P0116297

**Facility ID:** 1677011129

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

## **C. Emissions Unit Terms and Conditions**



**1. Emissions Unit Group - Coating Lines 1: K001, K002, K003, K005, K007, K008**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
K001	Coating of miscellaneous metal parts and foam.
K002	Coating of miscellaneous metal parts and foam.
K003	Coating of miscellaneous metal parts and foam.
K005	Coating of miscellaneous metal parts and foam.
K007	Coating of miscellaneous metal parts and foam.
K008	Coating of miscellaneous metal parts and foam.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)c. and c)(1).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/2001	See c)(1) and b)(2)a.
b.	OAC rule 3745-31-05(A)(3), as effective 12/01/2006	See b)(2)b.
c.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V	Facility-wide VOC emissions shall not exceed 79.9 tons per year, based upon a rolling, 12-month summation of the monthly emissions.  Facility-wide hazardous air pollutant (HAP) emissions shall not exceed 9.9 tons per year based upon a rolling, 12-month summation for any individual HAP and 24.9 tons per year based upon a



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		rolling, 12-month summation for total combined HAPs.  See c)(1).
d.	OAC rule 3745-21-09(U)(2)(e)(ii)	See b)(2)c.
e.	OAC rule 3745-17-11(C)	See c)(2).

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emissions limitations/control measures no longer apply.

b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the uncontrolled potential to emit of VOC from this emissions unit is less than ten tons per year.

c. The permittee shall not employ more than three gallons of coating per day for the miscellaneous metal parts and products coating line. The daily usage limitation for the coating line shall not include coatings applied to parts or products which are not metal.

c) Operational Restrictions

(1) The maximum annual usage of coatings for each emissions unit shall not exceed 2,060 gallons based upon a rolling, 12 month summation of the monthly coating usage rates for each emissions unit.

(2) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.



d) Monitoring and/or Recordkeeping Requirements

- (1) On any day when coating miscellaneous metal parts, the permittee shall collect and record the following information each day for each emissions unit:
  - a. the name and identification number of each coating employed;
  - b. the volume, in gallons, of each coating employed; and
  - c. the total volume, in gallons, of all the coatings employed.
- (2) The permittee shall collect and record the following information each month for the entire facility:
  - a. the company identification of each coating (including whether it is used for metal or non-metal parts) and cleanup material employed;
  - b. the number of gallons of each coating and cleanup material employed;
  - c. the number of gallons of all coatings employed [i.e., the sum of d)(2)b. for the calendar month];
  - d. the VOC content of each coating and cleanup material, in pounds per gallon;
  - e. the amount of each individual HAP in each coating and cleanup material, in pounds per gallon;
  - f. the VOC emissions from all coatings and cleanup materials employed [i.e., the sum of d)(2)b. x d)(2)d.], in pounds per month;
  - g. the total emissions for each HAP from all coatings and cleanup materials employed [i.e., d)(2)b. multiplied by d)(2)e.], in pounds per month;
  - h. the total HAP emissions for the combination of all HAPs from all coatings and cleanup materials employed [i.e., the sum of d)(2)g.], in pounds per month;
  - i. the rolling 12-month VOC emissions, in tons [i.e., the total VOC emissions for the current calendar month, plus the total VOC emissions from the previous eleven calendar months];
  - j. the rolling, 12-month individual HAP emissions, in tons [i.e., the total individual HAP emissions for the current calendar month, plus the total individual HAP emissions from the previous eleven calendar months];
  - k. the rolling, 12-month combined HAP emissions, in tons [i.e., the total combined HAP emissions for the current calendar month, plus the total combined HAP emissions from the previous eleven calendar months]; and
  - l. the rolling, 12-month coating usage, in gallons [i.e., the total amount of coatings used for the current calendar month, plus the total amount of coatings used from the previous eleven calendar months].



Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.

- (3) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
- (4) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.
- (5) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (6) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
  - a. the date of the inspection;
  - b. a description of each/any problem identified and the date it was corrected;
  - c. a description of any maintenance and repairs performed; and
  - d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

- (7) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.
- (8) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified permit-to-install and operate (PTIO) 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 toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTIO.

e) Reporting Requirements

- (1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage limit. 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 45 days after the exceedance occurs.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
  - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
    - i. 79.9 tons of VOC per rolling, 12-month period;
    - ii. 9.9 tons of any individual HAP per rolling, 12-month period;
    - iii. 24.9 tons of all combined HAPs per rolling, 12-month period; and
    - iv. 2,060 gallons of coatings per rolling, 12-month period.
  - b. the probable cause of each deviation (excursion);
  - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
  - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (4) 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 District Office or Local Air Agency, 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 signatory authority may be represented as provided through procedures established in Air Services.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

The permittee shall not employ more than three gallons of coating per day for the miscellaneous metal parts and products coating line. The daily usage limitation for the coating line shall not include coatings applied to parts or products which are not metal.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(1)c.

b. Emission Limitation:

The maximum annual usage of coatings for each emissions unit shall not exceed 2,060 gallons based upon a rolling, 12 month summation of the monthly coating usage rates for each emissions unit.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(2)l.

c. Emission Limitation:

Facility-wide VOC emissions shall not exceed 79.9 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(2)i.



d. Emission Limitation:

Facility-wide hazardous air pollutant (HAP) emissions shall not exceed 9.9 tons per year based upon a rolling 12-month summation for any individual HAP and 24.9 tons per year based upon a rolling 12-month summation for total combined HAPs.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(2)j. and d)(2)k.

- (2) In accordance with OAC rule 3745-21-04(B)(5), facilities located in Ashtabula, Butler, Clark, Clermont, Cuyahoga, Delaware, Franklin, Geauga, Greene, Hamilton, Lake, Licking, Lorain, Lucas, Mahoning, Medina, Miami, Montgomery, Portage, Stark, Summit, Trumbull, Warren and Wood Counties shall use U.S. EPA Method 24 to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the U.S. EPA and shall use formulation data for that coating to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24.

g) Miscellaneous Requirements

- (1) None.



**2. Emissions Unit Group - Coating Lines 2: K004, K006, K009, K010**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
K004	Coating of miscellaneous metal parts and foam.
K006	Coating of miscellaneous metal parts and foam.
K009	Coating of miscellaneous metal parts and foam.
K010	Coating of miscellaneous metal parts and foam.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)c. and c)(1).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/2001	See c)(1) and b)(2)a.
b.	OAC rule 3745-31-05(A)(3), as effective 12/01/2006	See b)(2)b.
c.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V	Facility-wide VOC emissions shall not exceed 79.9 tons per year, based upon a rolling, 12-month summation of the monthly emissions.  Facility-wide hazardous air pollutant (HAP) emissions shall not exceed 9.9 tons per year based upon a rolling 12-month summation for any individual HAP and 24.9 tons per year based upon a rolling 12-month summation for total combined HAPs.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See c)(1).
d.	OAC rule 3745-21-09(U)(1)(c)	See b)(2)c.
e.	OAC rule 3745-17-11(C)	See c)(2).

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emissions limitations/control measures no longer apply.

b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the uncontrolled potential to emit of VOC from this emissions unit is less than ten tons per year.

c. The VOC content of the coatings employed in the miscellaneous metal parts and products coating line shall not exceed 3.5 pounds per gallon, as applied, excluding water and exempt solvents. The VOC content limitation for the coating line shall not include coatings applied to parts or products which are not metal.

c) Operational Restrictions

(1) The maximum annual usage of coatings for each emissions unit shall not exceed 2,060 gallons based upon a rolling, 12 month summation of the monthly coating usage rates for each emissions unit.

(2) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.



d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for the entire facility:

- a. the company identification of each coating (including whether it is used for metal or non-metal parts) and cleanup material employed;
- b. the number of gallons of each coating and cleanup material employed;
- c. the number of gallons of all coatings employed [i.e., the sum of d)(1)b. for the calendar month];
- d. the VOC content of each coating and cleanup material, as applied, excluding water and exempt solvents, in pounds per gallon;
- e. the individual HAP content of each coating and cleanup material, in pounds per gallon;
- f. the VOC emissions from all coatings and cleanup materials employed [i.e., the sum of d)(1)b. x d)(1)d.], in pounds per month;
- g. the total emissions for each HAP from all coatings and cleanup materials employed [i.e., d)(1)b. multiplied by d)(1)e.], in pounds per month;
- h. the total HAP emissions for the combination of all HAPs from all coatings and cleanup materials employed [i.e., the sum of d)(1)g.], in pounds per month;
- i. the rolling 12-month VOC emissions, in tons [i.e., the total VOC emissions for the current calendar month, plus the total VOC emissions from the previous eleven calendar months];
- j. the rolling, 12-month individual HAP emissions, in tons [i.e., the total individual HAP emissions for the current calendar month, plus the total individual HAP emissions from the previous eleven calendar months];
- k. the rolling, 12-month combined HAP emissions, in tons [i.e., the total combined HAP emissions for the current calendar month, plus the total combined HAP emissions from the previous eleven calendar months]; and
- l. the rolling, 12-month coating usage, in gallons [i.e., the total amount of coatings used for the current calendar month, plus the total amount of coatings used from the previous eleven calendar months].

Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.

(2) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be



maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

- (3) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.
- (4) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (5) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
  - a. the date of the inspection;
  - b. a description of each/any problem identified and the date it was corrected;
  - c. a description of any maintenance and repairs performed; and
  - d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

- (6) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.
  - (7) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified permit-to-install and operate (PTIO) 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 toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTIO.
- e) 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 deviation (excursion) reports that identify:
  - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
    - i. 79.9 tons of VOC per rolling, 12-month period;
    - ii. 9.9 tons of any individual HAP per rolling, 12-month period;
    - iii. 24.9 tons of all combined HAPs per rolling, 12-month period; and
    - iv. 2,060 gallons of coatings per rolling, 12-month period.
  - b. the probable cause of each deviation (excursion);
  - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
  - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (4) 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 District Office or Local Air Agency, 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 signatory authority may be represented as provided through procedures established in Air Services.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

The VOC content of the coatings employed in the miscellaneous metal parts and products coating line shall not exceed 3.5 pounds per gallon, as applied, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(1)d.

b. Emission Limitation:

The maximum annual usage of coatings for each emissions unit shall not exceed 2,060 gallons based upon a rolling, 12 month summation of the monthly coating usage rates for each emissions unit.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(1)l.

c. Emission Limitation:

Facility-wide VOC emissions shall not exceed 79.9 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(1)i.

d. Emission Limitation:

Facility-wide hazardous air pollutant (HAP) emissions shall not exceed 9.9 tons per year based upon a rolling 12-month summation for any individual HAP and 24.9 tons per year based upon a rolling 12-month summation for total combined HAPs.



**Draft Permit-to-Install and Operate**

Russell Products Co FCS Division

**Permit Number:** P0116297

**Facility ID:** 1677011129

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

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(1)j. and d)(1)k.

- (2) In accordance with OAC rule 3745-21-04(B)(5), facilities located in Ashtabula, Butler, Clark, Clermont, Cuyahoga, Delaware, Franklin, Geauga, Greene, Hamilton, Lake, Licking, Lorain, Lucas, Mahoning, Medina, Miami, Montgomery, Portage, Stark, Summit, Trumbull, Warren and Wood Counties shall use U.S. EPA Method 24 to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the U.S. EPA and shall use formulation data for that coating to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24.
- g) Miscellaneous Requirements
- (1) None.