



10/6/2014

Mr. Michael Froman  
AKZO NOBEL COATINGS, INC.  
1313 WINDSOR AVENUE  
Columbus, OH 43211

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

Facility ID: 0125040064  
Permit Number: P0117273  
Permit Type: Initial Installation  
County: Franklin

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, The Columbus Dispatch. 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 Ohio EPA DAPC, Central District Office  
50 West Town Street, 6th Floor  
P.O. Box 1049  
Columbus, OH 43216-1049

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 Ohio EPA DAPC, Central District Office at (614)728-3778.

Sincerely,

Erica R. Engel-Ishida, Interim Manager  
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 Via E-Mail Notification  
Ohio EPA-CDO



PUBLIC NOTICE

10/6/2014 Issuance of Draft Air Pollution Permit-To-Install and Operate

AKZO NOBEL COATINGS, INC.

1313 WINDSOR AVENUE,

Columbus, OH 43211

Franklin County

FACILITY DESC.: Paint and Coating Manufacturing

PERMIT #: P0117273

PERMIT TYPE: Initial Installation

PERMIT DESC: Initial installation permit for small batch mixing stations and thindown tank.

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: Todd Scarborough, Ohio EPA DAPC, Central District Office, 50 West Town Street, 6th Floor P.O. Box 1049, Columbus, OH 43216-1049. Ph: (614)728-3778





## Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

AKZO Nobel Coatings, located in Columbus, has submitted an application for a FEPTIO, which includes proposed federally enforceable limits in order to effectively restrict the affected facility's Potential To Emit(PTE) below those levels which trigger Title V permitting requirements. This proposed Federally Enforceable Permit To Install and Operate(FEPTIO) is specific to new emission units that will be part of the coil coatings portion of their manufacturing facility.

3. Facility Emissions and Attainment Status:

The Coils Coatings part of the facility is the original portion of the plant installed during the mid 1990s when the facility underwent a major modernization and became a synthetic minor facility. It is Akzo's intention to maintain all of their federally enforceable limitations so as to avoid Title V permitting requirements. In the absence of federally enforceable limitations, AKZO Nobel Coatings would have a PTE of greater than 100 tons per year of VOC/ 10 tons per year of any single HAP and 25 tons per year of total HAPs based upon maximum hourly emission rates and 8,760 hours per year of operation. AKZO's PTE of each of the remaining criteria pollutants is less than 100 tons per year. The Total Facility PTE, after taking into consideration the proposed restrictions and the current PTE of the Resin portion of the facility, will be 28.32 tons VOC, 9.02 tons of any single HAP and 13.87 tons of Total HAP. Table 1, below provides the basis for the Total Facility PTE

**Table 1: Current Facility-Wide PTE**

Description	Pollutant Emission Rates (tons/year)						
	PM	SO <sub>2</sub>	VOC	NO <sub>x</sub>	CO	Highest Single HAP	Total HAPs
Coil Extrusion Coating Manufacturing	0.69		19.54			6.14	10.41
Roadways (F002)	5.97						
External Combustion Units (Boilers, Space Heaters, Thermal Oxidizer Burner, Ovens)	1.77	36.3	0.93	20.07	14.17		0.38
Internal Combustion Engines (Emergency Generators and Firepump)	0.08	0.07	0.30	1.80	0.29		0.13
Resins Manufacturing	1.14		6.84			2.88	2.88
Resins Loading Rack Number <sup>1</sup> (J002)			-- <sup>1</sup>				-- <sup>1</sup>



Description	Pollutant Emission Rates (tons/year)						
	PM	SO <sub>2</sub>	VOC	NOx	CO	Highest Single HAP	Total HAPs
Solvent Tank Farm			0.63				0.08
Bulk Resin Storage			0.05				
Three 5,000 gal intermediate storage tanks (T324 to T326)			0.00195				
<b>TOTAL</b>	<b>9.65</b>	<b>36.37</b>	<b>28.32</b>	<b>21.87</b>	<b>14.46</b>	<b>9.02</b>	<b>13.87</b>

1: Allowable emissions for emission unit are incorporated into the total emissions for Resins Manufacturing (PTIO P0113140)

#### 4. Source Emissions:

The facility and the Ohio EPA have agreed to short term emission restrictions and operational restrictions which correspond to maximum annual emissions from the affected emissions units (coil coatings portion of plant plant) of 19.54 tons VOC/yr, 10.41 tons total HAPs/yr and 6.14 tons of any single HAP/yr.

Table 2, below summarizes the emissions and before and after the changes at the facility.

**Table 2: Source Emissions**

Emission Groups	Unit	Annual Throughput Limits		Through put Units	Emission Limits (tons/year)						
		Before	After		Before			After			
					VOC	PM	Single HAP	VOC	PM	Single HAP	Total HAPs
Large Batch Premix Tanks		9.00	7.50	MMgpy	1.37	0.68	6.14	1.14	0.57	6.14	10.41
Large Batch Thindown Tanks		9.00	7.50	MMgpy	0.66	0.02		0.55	0.02		
Filter Carts		9.50	8.20	MMgpy	0.90	0.00		0.77	0.00		
Small Batch Portable Tank Mixing		0.50	0.70	MMgpy	6.22	0.10		8.62	0.10		
Intermix		0.60	1.30	MMgpy				0.45	0.00		
Strontium Chromate		404,920	404,920	gpy	3.58E-03	2.29E-06		3.58E-03	2.29E-06		
Floor Mopping		548	548	gpy	2.19	0.00		2.19	0.00		
Pail Washer		43,800	43,800	wash cycles	0.09	0.00		0.09	0.00		
Tank Washer		13,505	13,505	tanks cleaned	2.30	0.00		2.28	0.00		
Shaft Cleaner		13,505	27,375	shafts cleaned	1.69	0.00		3.42	0.00		
Resin Tanker Loading Arm (J001)		1,000	1,000	Mgpy	0.025	0.00	0.025	0.00			
<b>TOTAL</b>					<b>15.43</b>	<b>0.80</b>	<b>6.14</b>	<b>19.54</b>	<b>0.69</b>	<b>6.14</b>	<b>10.41</b>



The proposed FESOPs include monthly record keeping and excursion reporting to ensure continued compliance with the permitted emission limits. Moreover, the proposed FESOPs include monthly production limitations for each of the initial 12 months of operation in order to ensure compliance during the initial 12 months of operation.

5. Conclusion:

The operation of emissions units in accordance with the production limitations specified above, per 12-month rolling period, will result in maximum annual facility emissions below those levels which trigger Title V permitting requirements.

The proposed FESOPs include federally enforceable limits, record keeping, reporting and production limitations during the initial 12 months of operation to ensure continued compliance with the FESOP's requirements.

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	19.54
Single HAP	6.14
Total HAP	10.41





**DRAFT**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
AKZO NOBEL COATINGS, INC.**

Facility ID:	0125040064
Permit Number:	P0117273
Permit Type:	Initial Installation
Issued:	10/6/2014
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  
AKZO NOBEL COATINGS, INC.

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

AKZO NOBEL COATINGS, INC.

**Permit Number:** P0117273

**Facility ID:** 0125040064

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

## Authorization

Facility ID: 0125040064  
Application Number(s): A0051162  
Permit Number: P0117273  
Permit Description: Initial installation permit for small batch mixing stations and thindown tank.  
Permit Type: Initial Installation  
Permit Fee: \$2,000.00 *DO NOT send payment at this time, subject to change before final issuance*  
Issue Date: 10/6/2014  
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:

AKZO NOBEL COATINGS, INC.  
1313 WINDSOR AVENUE  
Columbus, OH 43211

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:

Ohio EPA DAPC, Central District Office  
50 West Town Street, 6th Floor  
P.O. Box 1049  
Columbus, OH 43216-1049  
(614)728-3778

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: P0117273

Permit Description: Initial installation permit for small batch mixing stations and thindown tank.

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

<b>Emissions Unit ID:</b>	<b>P396</b>
Company Equipment ID:	TD-267
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

**Group Name: Small Batch**

<b>Emissions Unit ID:</b>	<b>P387</b>
Company Equipment ID:	AG-796
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P388</b>
Company Equipment ID:	AG-797
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P389</b>
Company Equipment ID:	AG-718
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P390</b>
Company Equipment ID:	AG-719
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P391</b>
Company Equipment ID:	AG-735
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P392</b>
Company Equipment ID:	AG-791
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P393</b>
Company Equipment ID:	AG-792
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P394</b>
Company Equipment ID:	AG-793
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P395</b>
Company Equipment ID:	AG-795
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



**Draft Permit-to-Install and Operate**  
AKZO NOBEL COATINGS, INC.  
**Permit Number:** P0117273  
**Facility ID:** 0125040064  
**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 Ohio EPA DAPC, Central District Office 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**

AKZO NOBEL COATINGS, INC.

**Permit Number:** P0117273

**Facility ID:** 0125040064

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

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



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

AKZO NOBEL COATINGS, INC.

**Permit Number:** P0117273

**Facility ID:** 0125040064

**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**  
AKZO NOBEL COATINGS, INC.  
**Permit Number:** P0117273  
**Facility ID:** 0125040064  
**Effective Date:** To be entered upon final issuance

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



**1. P396, TD-267**

**Operations, Property and/or Equipment Description:**

a) 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.

(1) d)(5)

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.

(2) b)(1)a., See b)(2)c thru b)(2)g. and b)(2)l. thru b)(2)p., c(1), d)(1) through(4), d)(6),d)(7), e)(1), e)(2), e)(5), e)(6) and f)(1)a. through f.

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(D)	See b)(2)c thru b)(2)g. and b)(2)l. thru b)(2)p.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	The permittee shall control VOC emissions from this emissions unit through the use of a Regenerative Thermal Oxidizer with a designed minimum control efficiency of 97.55%.  See b)(2)a below.
c.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)b below.
d.	OAC rule 3745-17-11(B)(1)	The emission limit specified by this rule is equivalent to or less stringent than the emission limit established pursuant to OAC rule 3745-31-05(D).
e.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions shall not exceed 20% opacity, as a six (6)-minute average, except as provided by the rule.



(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to 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 ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants 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 3745-31-05, then these emission limits/control measures no longer apply.

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.

- b. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from these air contaminant sources since the uncontrolled potential to emit for VOC emissions is less than 10 tons per year.
- c. The VOC emissions from this emissions unit shall be vented to the thermal oxidizer that shall meet the operational, monitoring, and record keeping requirements of this permit, when the emissions unit is in operation.
- d. The permittee shall control VOC emissions from this emissions unit through the use of a Regenerative Thermal Oxidizer with a minimum control efficiency of 97.55%.
- e. The emissions from the Large Batch Production Area, Premix and Thindown Tanks, (emissions units P201 through P224, P226 through P255, P346, P347, P375, P376, P396) shall not exceed the following:

Volatile Organic Compounds (VOC) from Premix Tanks 1.14 tons/year

Volatile Organic Compounds (VOC) from Thindown Tanks 0.55 ton/year

Particulate Matter (PM) from Premix Tanks 0.57 ton/year

Particulate Matter (PM) from Thindown Tanks 0.02 ton/year

- f. This facility shall utilize a Premix Tank VOC Truck Bay Door emission factor of 5.128E-06 lbs. VOC/gal. of product produced in the Large Batch Production Area for emissions units, P201, and P203 through P211 unless otherwise approved in writing by Ohio EPA, CDO. This emission factor was developed in accordance with the permit application submitted July 7, 2014.



- g. This facility shall utilize a Premix Tank VOC Concentrator/Oxidizer (hereinafter "Conc/Ox") emission factor of  $4.698 \times 10^{-5}$  lbs. VOC/gal. of product produced in the Large Batch Production Area for emissions units, P201, and P203 through P211 unless otherwise approved in writing by Ohio EPA, CDO. This emission factor was developed in accordance with the permit application submitted July 7, 2014.
- h. This facility shall utilize a Premix Tank PM Large Batch Fugitive Stack emission factor of  $4.93 \times 10^{-5}$  lbs. PM/gal. of product produced in the Large Batch Production Area for emissions units, P201, and P203 through P211 unless otherwise approved in writing by Ohio EPA, CDO. This emission factor was developed in accordance with the permit application submitted July 7, 2014.
- i. This facility shall utilize a Premix Tank PM Truck Bay Door emission factor of  $3.02 \times 10^{-6}$  lbs. PM/gal. of product produced in the Large Batch Production Area for emissions units, P201, and P203 through P211 unless otherwise approved in writing by Ohio EPA, CDO. This emission factor was developed in accordance with the permit application submitted July 7, 2014.
- j. This facility shall utilize a Thindown Tank PM Large Batch Fugitive Stack emission factor of  $1.47 \times 10^{-6}$  lbs. PM/gal. of product produced in the Large Batch Production Area for emission units P202a and P212 through P224 and P226 through P255 unless otherwise approved in writing by Ohio EPA, CDO. This emission factor was developed in accordance with the permit application submitted July 7, 2014.
- k. This facility shall utilize a Thindown Tank PM Truck Bay Door emission factor of  $9.02 \times 10^{-8}$  lbs. PM/gal. of product produced in the Large Batch Production Area for emission units P202 and P212 through P224, P226 through P255, P346, P347, P375, P376, and P396, unless otherwise approved in writing by Ohio EPA, CDO. This emission factor was developed in accordance with the permit application submitted July 7, 2014.
- l. This facility shall utilize a Thindown Tank VOC Large Batch Fugitive Stack emission factor of  $1.364 \times 10^{-5}$  lbs. VOC/gal. of product produced in the Large Batch Production Area for emissions units, P202 and P212 through P224, P226 through P255, P346, P347, P375, P376, and P396, unless otherwise approved in writing by Ohio EPA, CDO. This emission factor was developed in accordance with the permit application submitted July 7, 2014.
- m. This facility shall utilize a Thindown Tank VOC Conc/Ox emission factor of  $1.047 \times 10^{-4}$  lbs. OC/gal. of product produced in the Large Batch Production Area for emissions units, P202 and P212 through P224, P226 through P255, P346, P347, P375, P376, and P396, unless otherwise approved in writing by Ohio EPA, CDO. This emission factor was developed in accordance with the permit application submitted July 7, 2014.
- n. Emissions of any individual HAP from all emission units located at this facility included as part of the coil/extrusion coating operation shall not exceed 6.14 tons per year, as a rolling, 12-month summation.



- o. Emissions of VOC from all emission units located at this facility included as part of the coil/extrusion coating operation shall not exceed 19.54 tons per year, as a rolling, 12-month summation.
  - p. Emissions of Total HAP from all emission units located at this facility included as part of the coil/extrusion coating operation shall not exceed 10.41 tons per year, as a rolling, 12-month summation.
  - q. The coil/extrusion coating portion of this facility includes those emission units covered by Air Permit to Install and Operate number P0117273 and this permit.
- c) Operational Restrictions
- (1) The maximum rolling twelve (12) month coatings production rate for the Large Batch Production Area (emissions units P201 through P224 and P226 through P255) shall be limited to 7,500,000 gallons. The production emissions will be assigned to the day the coating is drained from the letdown tank (corresponds to filling report).
- d) Monitoring and/or Recordkeeping Requirements
- (1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit(s) controlled by the thermal oxidizer is/are in operation, shall not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance.
  - (2) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal oxidizer when the emissions unit(s) is/are in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within  $\pm 1$  percent of the temperature being measured or  $\pm 5$  degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:
    - a. all 3-hour blocks of time, when the emissions unit(s) controlled by the thermal oxidizer was/were in operation, during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance; and
    - b. a log (date and total time) of the downtime or bypass of the capture (collection) system and thermal oxidizer, and/or downtime of the monitoring equipment, when the associated emissions unit(s) was/were in operation.



These records shall be maintained at the facility for a period of three years.

- (3) Whenever the monitored average combustion temperature within the thermal oxidizer deviates from the range or limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:
- a. the date and time the deviation began;
  - a. the magnitude of the deviation at that time;
  - b. the date the investigation was conducted;
  - c. the name(s) of the personnel who conducted the investigation; and
  - d. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- e. a description of the corrective action;
- f. the date corrective action was completed;
- g. the date and time the deviation ended;
- h. the total period of time (in minutes) during which there was a deviation;
- i. the temperature readings immediately after the corrective action was implemented; and
- j. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

- (4) The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted temperature range/limit based upon information obtained during future performance tests that demonstrate compliance with the allowable emission rate(s) for the controlled pollutant(s). In addition, approved revisions to the temperature range/limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of administrative modification.



- (5) 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 FEPTIO 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 FEPTIO.
  
  - (6) This facility shall maintain monthly records which list the following information for products produced in the portion of this facility: for the coil/extrusion coating
    - a. calculations showing the rolling, 12-month individual HAP emissions for each HAP for all the materials employed; and
    - b. calculations showing the rolling, 12-month total combined HAPs emissions for all the materials employed; and
    - c. calculations showing the rolling, 12-month total VOC emissions for all the materials employed.
  
  - (7) This facility shall maintain daily records which list the following information for products produced in the Large Batch Production Area (emissions units P201 through P224, P226 through P255, P346, P347, P375, P376, and P396):
    - a. the number of gallons of product produced in the Large Batch Production Area;
    - b. the number of gallons of product produced in each emissions unit;
    - c. the total hours of daily operation of each emissions unit;
- e) Reporting Requirements
- (1) This facility shall submit quarterly reports to the Central District Office, which provide the total VOC emissions for the Large Batch Thindown Tanks, emissions units P202, P212 through P224, P226 through P255, P346, P347, P375, P376, and P396, total VOC emissions for the Large Batch Premix Tanks, emissions units P201, and P203 through P211, total PM emissions for the Large Batch Production Area, emissions units P201 through P224, P226 through P255, P346, P347, P375, P376, and P396, and which documents any exceedance(s) of the permitted production rate and/or emissions limits, for the previous three (3) calendar months (October 1 through December 31, January 1 through March 31, April 1 through June 30, and July 1 through September 30, respectively). The reports shall be submitted by February 15, May 15, August 15, and November 15 of each year.
  
  - (2) The permittee shall submit quarterly summaries of the following records:



- a. all 3-hour blocks of time (when the emissions unit(s) was/were in operation) during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature maintained during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance;
- b. any records of downtime (date and length of time) for the capture (collection) system, the thermal oxidizer, and/or the monitoring equipment when the emissions unit(s) was/were in operation; and
- c. a log of the operating time for the capture system, thermal oxidizer, monitoring equipment, and the emissions unit(s).
- d. all exceedances of the rolling, rolling 12-month limitation of the production rate;

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) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (4) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA e-Business Center: Air Services 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.
- (5) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the thermal oxidizer during the 12-month reporting period for this/these emissions unit(s):
  - a. each period of time (start time and date, and end time and date) when the average combustion temperature within the thermal oxidizer was outside of the acceptable range;
  - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the thermal oxidizer;
  - c. each incident of deviation described in "a" or "b" (above) where a prompt investigation was not conducted;
  - d. each incident of deviation described in "a" or "b" where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the temperature within the thermal oxidizer into compliance with the acceptable range, was determined to be necessary and was not taken; and



- e. each incident of deviation described in “a” or “b” where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.
- (6) The permittee shall submit quarterly deviation (excursion) reports that identify the following information:
- a. all exceedances of the rolling, 12-month individual HAP emission limitation for each HAP for all the materials employed; and
  - b. all exceedances of the rolling, 12-month total combined HAPs emission limitation for all the materials employed.
  - c. all exceedances of the rolling, 12-month total VOC emission limitation for all the materials employed.
- 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 Limitations:** The permittee shall control VOC emissions from this emissions unit through the use of a Regenerative Thermal Oxidizer with a minimum control efficiency of 97.55%
- Applicable Compliance Method: The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- i. The emission testing shall be conducted within 6 months after issuance of this permit and within 6 months prior to permit renewal.
  - ii. The emission testing shall be conducted to demonstrate compliance with the minimum VOC control efficiency of 97.55%
  - iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s) for:  
  
VOC, Methods 1-4 and 25 and/or 18 of 40 CFR Part 60, Appendix A
- Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
- The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of



the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

- iv. The test(s) shall be conducted while the facility is operating at or near its maximum capacity unless otherwise specified or approved by the Ohio EPA, CDO.

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

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

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

- b. Emissions Limitation: VOC emissions from the Large Batch Production Area, Premix Tanks, (emissions units P201 through P224, P226 through P255, P346, P347, P375, P376, P396) shall not exceed 1.14tons per year.

Applicable Compliance Method: Compliance with the annual emissions limitation shall be determined by the actual 12 month summation of VOC emissions produced, in tons per year, (as derived from the records required by term and condition d)(7) above).

- c. Emissions Limitation: VOC emissions from the Large Batch Production Area, Thindown Tanks, (emissions units P201 through P224, P226 through P255, P346, P347, P375, P376, P396) shall not exceed 0.55 ton per year

Applicable Compliance Method: Compliance with the annual emissions limitation shall be determined by the actual 12 month summation of VOC emissions produced, in tons per year, (as derived from the records required by term and condition d)(7) above).



- d. Emission Limitation: Emissions of any individual HAP from all emission units located at this facility included as part of the coil/extrusion coating operation shall not exceed 6.14 tons per year, as a rolling, 12-month summation.

Applicable Compliance Method: Compliance with the rolling 12 month emissions limitation shall be determined by the actual rolling 12 month summation of individual HAP emissions produced, in tons per rolling 12 month period, (as derived from the records required by term and condition d)(6) above).

- e. Emission Limitation: Emissions of VOC from all emission units located at this facility included as part of the coil/extrusion coating operation shall not exceed 19.54 tons per year, as a rolling, 12-month summation.

Applicable Compliance Method: Compliance with the rolling 12 month emissions limitation shall be determined by the actual rolling 12 month summation of VOC emissions produced, in tons per rolling 12 month period, (as derived from the records required by term and condition d)(6) above).

- f. Emission Limitation: Emissions of Total HAP from all emission units located at this facility included as part of the coil/extrusion coating operation shall not exceed 10.41 tons per year, as a rolling, 12-month summation

Applicable Compliance Method: Compliance with the rolling 12 month emissions limitation shall be determined by the actual rolling 12 month summation of total HAP emissions produced, in tons per rolling 12 month period, (as derived from the records required by term and condition d)(6) above).

- g. Emission Limitation: Visible particulate emissions from the stack shall not exceed 20% opacity as a 6-minute average.

Applicable Compliance Method: Compliance shall be determined using Method 9 as set forth in 40 CFR Part 60 Appendix A, as such appendix existed on July 1, 1996 and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

- h. Emission Limitation: The particulate emissions from the Large Batch Production Area, Premix Tanks, (emissions units P202, P212, P216 through 217, P219 through P223, P226 through P255, P347, and P375 through P376) shall not exceed from 0.57 ton/year.

Applicable Compliance Method: Compliance with the annual emissions limitation shall be determined by the actual 12 month summation of particulate emissions produced, in tons per year, (as derived from the records required by term and condition d)(7) above).

- i. Emission Limitation: The particulate emissions from the Large Batch Production Area, thindown Tanks, (emissions units P202, P212, P216 through 217, P219 through P223,



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

AKZO NOBEL COATINGS, INC.

**Permit Number:** P0117273

**Facility ID:** 0125040064

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

P226 through P255, P347, and P375 through P376) shall not exceed from 0.02 ton/year.

Applicable Compliance Method: Compliance with the annual emissions limitation shall be determined by the actual 12 month summation of particulate emissions produced, in tons per year, (as derived from the records required by term and condition d)(7) above).

g) Miscellaneous Requirements

(1) None.



**2. Emissions Unit Group -Small Batch: P387,P388,P389,P390,P391,P392,P393,P394,P395,**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
P387	small batch portable mixing station
P388	small batch portable mixing station
P389	small batch portable mixing station
P390	small batch portable mixing station
P391	small batch portable mixing station
P392	micro batch mixing station
P393	micro batch mixing station
P394	micro batch mixing station
P395	micro batch mixing station

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. d)(5)

(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)a., See b)(2)c. thru b)(2)j. and b)(2) n. thru b)(2)q., c(1),c(2), d)(1) through(4), d)(6),d)(7), e)(1), e)(5),e)(6) and f)(1)a., f)(1)b. and f)(1)d. thru f.

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(D)	See b)(2)c. thru b)(2)j. and b)(2) n. thru b)(2)q.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	The permittee shall control VOC emissions from this emissions unit through the use of a Regenerative Thermal Oxidizer with a designed minimum control efficiency of 97.55%.  See b)(2)a below.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)b below.
d.	OAC rule 3745-17-11(B)(1)	The emission limit specified by this rule is equivalent to or less stringent than the emission limit established pursuant to OAC rule 3745-31-05(D).
e.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions shall not exceed 20% opacity, as a six (6)-minute average, except as provided by the rule.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to 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 ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants 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 3745-31-05, then these emission limits/control measures no longer apply.

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.

- b. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from these air contaminant sources since the uncontrolled potential to emit for VOC emissions is less than 10 tons per year.
- c. The VOC emissions from this emissions unit shall be vented to the thermal oxidizer that shall meet the operational, monitoring, and record keeping requirements of this permit, when the emissions unit is in operation.
- d. The permittee shall control VOC emissions from this emissions unit through the use of a Regenerative Thermal Oxidizer with a minimum control efficiency of 97.55%.
- e. This facility shall utilize a Mixing Station VOC Small Batch Primary Portable Fugitive Stack emission factor of 3.589 E-3 lbs. VOC/gal. of product produced in the Small Batch Portable Production Area for emissions units, P275 through P291, P305 through P308, P326 through P335, P371, and P387 through P395, unless otherwise approved in writing by Ohio EPA, CDO. This emission factor was developed in accordance with the permit application submitted July 7, 2014.



- f. This facility shall utilize a Mixing Station VOC Small Batch Primary Portable Truck Bay Door emission factor of 1.465 E-4 lbs. VOC/gal. of product produced in the Small Batch Portable Production Area for emissions units, P275 through P291, P305 through P308, P326 through P335, P371, and P387 through P395, unless otherwise approved in writing by Ohio EPA, CDO. This emission factor was developed in accordance with the permit application submitted July 7, 2014.
- g. This facility shall utilize a Mixing Station VOC Small Batch Primary Portable Conc/Ox emission factor of 1.73 E-2 lbs. VOC/gal. of product produced in the Small Batch Portable Production Area for emissions units P275 through P291, P305 through P308, P326 through P335, P371, and P387 through P395, unless otherwise approved in writing by Ohio EPA, CDO. This emission factor was developed in accordance with the permit application submitted July 7, 2014.
- h. This facility shall utilize a Mixing Station VOC Small Batch Intermix Portable Fugitive Stack emission factor of 1.778 E-4 lbs. VOC/gal. of product produced in the Small Batch Portable Production Area for emissions units, P275 through P291, P305 through P308, P326 through P335, P371, and P387 through P395, unless otherwise approved in writing by Ohio EPA, CDO. This emission factor was developed in accordance with the permit application submitted July 7, 2014.
- i. This facility shall utilize a Mixing Station VOC Small Batch Intermix Portable Truck Bay Door emission factor of 7.258 E-6 lbs. VOC/gal. of product produced in the Small Batch Portable Production Area for emissions units, P275 through P291, P305 through P308, P326 through P335, P371, and P387 through P395, unless otherwise approved in writing by Ohio EPA, CDO. This emission factor was developed in accordance with the permit application submitted July 7, 2014.
- j. This facility shall utilize a Mixing Station VOC Small Batch Intermix Portable Conc/Ox emission factor of 3.219 E-4 lbs. VOC/gal. of product produced in the Small Batch Portable Production Area for emissions units, P275 through P291, P305 through P308, P326 through P335, P371, and P387 through P395, unless otherwise approved in writing by Ohio EPA, CDO. This emission factor was developed in accordance with the permit application submitted July 7, 2014.
- k. This facility shall utilize a Mixing Station PM Small Batch Primary Portable Conc/Ox emission factor of 2.2 E-5 lbs. PM/gal. of product produced in the Small Batch Portable Production Area for emissions units P275 through P291, P305 through P308, P326 through P335, P371, and P387 through P395, unless otherwise approved in writing by Ohio EPA, CDO. This emission factor was developed in accordance with the permit application submitted July 7, 2014.
- l. This facility shall utilize a Mixing Station PM Small Batch Primary Portable Truck Bay Door emission factor of 5.09 E-6 lbs. PM/gal. of product produced in the Small Batch Portable Production Area for emissions units, P275 through P291, P305 through P308, P326 through P335, P371, and P387 through P395, unless otherwise approved in writing by Ohio EPA, CDO. This emission factor was developed in accordance with the permit application submitted July 7, 2014.



- m. This facility shall utilize a Mixing Station PM Small Batch Primary Portable fugitive stack emission factor of 1.25 E-4 lbs. PM/gal. of product produced in the Small Batch Portable Production Area for emissions units, P275 through P291, P305 through P308, P326 through P335, P371, and P387 through P395, unless otherwise approved in writing by Ohio EPA, CDO. This emission factor was developed in accordance with the permit application submitted July 7, 2014.
- n. The emissions from the Small Batch Portable Production Area, (emissions units P275 through P291, P305 through P308, P326 through P335, P371, and P387 through P395) shall not exceed the following:
  - Volatile Organic Compounds (VOC) 9.06 tons/year
  - Particulate Matter (PM) 0.1 ton/year
- o. Emissions of any individual HAP from all emission units located at this facility included as part of the coil/extrusion coating operation shall not exceed 6.14 tons per year, as a rolling, 12-month summation.
- p. Emissions of VOC from all all emission units located at this facility included as part of the coil/extrusion coating operation shall not exceed 19.54 tons per year, as a rolling, 12-month summation.
- q. Emissions of Total HAP from all all emission units located at this facility included as part of the coil/extrusion coating operation shall not exceed 10.41 tons per year, as a rolling, 12-month summation.

c) Operational Restrictions

- (1) The maximum rolling twelve (12) month coatings production rate for the Small Batch Primary Portable Production Area, Mixing Stations, (emissions units P275 through P291, P305 through P308, P326 through P335, P371, and P387 through P395) shall be limited 700,000 gallons. The production rate shall be calculated at the time the product is put into drums or totes (corresponds to filling report).
- (2) The maximum rolling twelve (12) month coatings production rate for the Small Batch Intermix Portable Production Area, Mixing Stations, (emissions units P275 through P291, P305 through P308, P326 through P335, P371, and P387 through P395) shall be limited 1,300,000 gallons. The production rate shall be calculated at the time the product is put into drums or totes (corresponds to filling report).

d) Monitoring and/or Recordkeeping Requirements

- (1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit(s) controlled by the thermal oxidizer is/are in operation, shall not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance.



- (2) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal oxidizer when the emissions unit(s) is/are in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within  $\pm 1$  percent of the temperature being measured or  $\pm 5$  degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:
- a. all 3-hour blocks of time, when the emissions unit(s) controlled by the thermal oxidizer was/were in operation, during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance; and
  - b. a log (date and total time) of the downtime or bypass of the capture (collection) system and thermal oxidizer, and/or downtime of the monitoring equipment, when the associated emissions unit(s) was/were in operation.

These records shall be maintained at the facility for a period of three years.

- (3) Whenever the monitored average combustion temperature within the thermal oxidizer deviates from the range or limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:
- a. the date and time the deviation began;
  - b. the magnitude of the deviation at that time;
  - c. the date the investigation was conducted;
  - d. the name(s) of the personnel who conducted the investigation; and
  - e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;



- i. the total period of time (in minutes) during which there was a deviation;
- j. the temperature readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

- (4) The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted temperature range/limit based upon information obtained during future performance tests that demonstrate compliance with the allowable emission rate(s) for the controlled pollutant(s). In addition, approved revisions to the temperature range/limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of administrative modification.
- (5) 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 FEPTIO 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 FEPTIO.
- (6) This facility shall maintain monthly records which list the following information for products produced in the for the coil/extrusion coating portion of this facility:
  - a. calculations showing the rolling, 12-month individual HAP emissions for each HAP for all the materials employed; and
  - b. calculations showing the rolling, 12-month total combined HAPs emissions for all the materials employed; and
  - c. calculations showing the rolling, 12-month total VOC emissions for all the materials employed;
  - d. calculations showing the total PM emissions for all the materials employed.
- (7) This facility shall maintain daily records which list the following information for products produced in the Small Batch Portable Production Area (emissions units P275 through P291, P305 through P308, P326 through P335, P371, and P387 through P395):



- a. the number of gallons of product produced in the Small Batch Primary Portable Production Area;
  - b. thenumberofgallonsofproductproducedintheSmallBatchIntermixPortableProductionArea;
  - c. the number of gallons of product produced in each emissions unit;
  - d. the total hours of daily operation of each emissions unit;
- e) Reporting Requirements
- (1) The permittee shall submit quarterly summaries of the following records:
    - a. all 3-hour blocks of time (when the emissions unit(s) was/were in operation) during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature maintained during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance;
    - b. any records of downtime (date and length of time) for the capture (collection) system, the thermal oxidizer, and/or the monitoring equipment when the emissions unit(s) was/were in operation; and
    - c. a log of the operating time for the capture system, thermal oxidizer, monitoring equipment, and the emissions unit(s).
    - d. all exceedances of the rolling, rolling 12-month limitation of the production rate;

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.
  - (2) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
  - (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA e-Business Center: Air Services 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) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the thermal oxidizer during the 12-month reporting period for this/these emissions unit(s):
    - a. each period of time (start time and date, and end time and date) when the average combustion temperature within the thermal oxidizer was outside of the acceptable range;



- b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the thermal oxidizer;
  - c. each incident of deviation described in “a” or “b” (above) where a prompt investigation was not conducted;
  - d. each incident of deviation described in “a” or “b” where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the temperature within the thermal oxidizer into compliance with the acceptable range, was determined to be necessary and was not taken; and
  - e. each incident of deviation described in “a” or “b” where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.
- (5) The permittee shall submit quarterly deviation (excursion) reports that identify the following information:
- a. all exceedances of the rolling, 12-month individual HAP emission limitation for each HAP for all the materials employed; and
  - b. all exceedances of the rolling, 12-month total combined HAPs emission limitation for all the materials employed.
  - c. all exceedances of the rolling, 12-month total VOC emission limitation for all the materials employed.
- (6) This facility shall submit quarterly reports to the Central District Office, which provide the total VOC and PM emissions from the Small Batch Portable Production Area, (emissions units P275 through P291, P305 through P308, P326 through P335, P371, and P387 through P395), and which documents any exceedance(s) of the permitted emissions limits, for the previous three (3) calendar months (October 1 through December 31, January 1 through March 31, April 1 through June 30, and July 1 through September 30, respectively).
- 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 Limitations:** The permittee shall control VOC emissions from this emissions unit through the use of a Regenerative Thermal Oxidizer with a minimum control efficiency of 97.55%
- Applicable Compliance Method:** The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:



- i. The emission testing shall be conducted within 6 months after issuance of this permit and within 6 months prior to permit renewal.
- ii. The emission testing shall be conducted to demonstrate compliance with the minimum VOC control efficiency of 97.55%
- iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s) for:

VOC, Methods 1-4 and 25 and/or 18 of 40 CFR Part 60, Appendix A

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

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

- iv. The test(s) shall be conducted while the facility is operating at or near its maximum capacity unless otherwise specified or approved by the Ohio EPA, CDO.

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

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

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



- b. Emissions Limitation: VOC emissions from the Small Batch Portable Production Area, (emissions units P275 through P291, P305 through P308, P326 through P335, P371, and P387 through P395) shall not exceed 9.06 tons per year.

Applicable Compliance Method: Compliance with the annual emissions limitation shall be determined by the actual 12 month summation of VOC emissions produced, in tons per year, (as derived from the records required by term and condition d)(6) above).

- c. Emission Limitation: The particulate emissions from the Small Batch Portable Production Area, (emissions units P275 through P291, P305 through P308, P326 through P335, P371, and P387 through P395) shall not exceed 0.1 ton per year.

Applicable Compliance Method: Compliance with the annual emissions limitation shall be determined by the actual 12 month summation of particulate emissions produced, in tons per year, (as derived from the records required by term and condition d)(6) above).

- d. Emission Limitation: Emissions of any individual HAP from all emission units located at this facility included as part of the coil/extrusion coating operation shall not exceed 6.14 tons per year, as a rolling, 12-month summation.

Applicable Compliance Method: Compliance with the rolling 12 month emissions limitation shall be determined by the actual rolling 12 month summation of individual HAP emissions produced, in tons per rolling 12 month period, (as derived from the records required by term and condition d)(6) above).

- e. Emission Limitation: Emissions of VOC from all emission units located at this facility included as part of the coil/extrusion coating operation shall not exceed 19.54 tons per year, as a rolling, 12-month summation.

Applicable Compliance: Compliance with the rolling 12 month emissions limitation shall be determined by the actual rolling 12 month summation of VOC emissions produced, in tons per rolling 12 month period, (as derived from the records required by term and condition d)(6) above).

- f. Emission Limitation: Emissions of Total HAP from all emission units located at this facility included as part of the coil/extrusion coating operation shall not exceed 10.41 tons per year, as a rolling, 12-month summation

Applicable Compliance Method: Method: Compliance with the rolling 12 month emissions limitation shall be determined by the actual rolling 12 month summation of total HAP emissions produced, in tons per rolling 12 month period, (as derived from the records required by term and condition d)(6) above).

- g. Emission Limitation: Visible particulate emissions from the stack shall not exceed 20% opacity as a 6-minute average.



Applicable Compliance Method: Compliance shall be determined using Method 9 as set forth in 40 CFR Part 60 Appendix A, as such appendix existed on July 1, 1996 and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

- h. Emission Limitation: The particulate emissions from the Large Batch Production Area, Premix Tanks, (emissions units P202, P212, P216 through 217, P219 through P223, P226 through P255, P347, and P375 through P376) shall not exceed from 0.57 ton/year.

Applicable Compliance Method: Compliance with the annual emissions limitation shall be determined by the actual 12 month summation of particulate emissions produced, in tons per year, (as derived from the records required by term and condition d)(6) above).

- i. Emission Limitation: The particulate emissions from the Large Batch Production Area, thindown Tanks, (emissions units P202, P212, P216 through 217, P219 through P223, P226 through P255, P347, and P375 through P376) shall not exceed from 0.02 ton/year.

Applicable Compliance Method: Compliance with the annual emissions limitation shall be determined by the actual 12 month summation of particulate emissions produced, in tons per year, (as derived from the records required by term and condition d)(7) above).

- g) Miscellaneous Requirements

- (1) None.