



10/9/2014

Nancy Rizzardi
NPA COATINGS, INC.
11120 BEREA RD.
CLEVELAND, OH 44102

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 1318008021
Permit Number: P0117483
Permit Type: Initial Installation
County: Cuyahoga

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

How to appeal this permit

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
77 South High Street, 17th Floor
Columbus, OH 43215

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
No	SYNTHETIC MINOR TO AVOID TITLE V
No	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

How to save money, reduce pollution and reduce energy consumption

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/survey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Cleveland Division of Air Quality at (216)664-2297 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



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

Cc: CDAQ



FINAL

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

Facility ID:	1318008021
Permit Number:	P0117483
Permit Type:	Initial Installation
Issued:	10/9/2014
Effective:	10/9/2014
Expiration:	8/22/2022



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

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Authorization

Facility ID: 1318008021
Application Number(s): A0051445
Permit Number: P0117483
Permit Description: Initial PTIO for emissions units P029 and P030 that are two identical 2,700-gallon mixing tanks, controlled by Pulse Jet baghouse, where raw materials (solvents and powder pigment) are added, mixed, then product is milled and transferred to containers.
Permit Type: Initial Installation
Permit Fee: \$400.00
Issue Date: 10/9/2014
Effective Date: 10/9/2014
Expiration Date: 8/22/2022
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

NPA COATINGS, INC.
11120 BEREA RD.
CLEVELAND, OH 44102

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

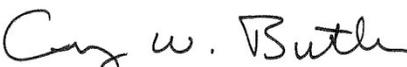
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

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

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: P0117483

Permit Description: Initial PTIO for emissions units P029 and P030 that are two identical 2,700-gallon mixing tanks, controlled by Pulse Jet baghouse, where raw materials (solvents and powder pigment) are added, mixed, then product is milled and transferred to containers.

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

Group Name: 2 Mixing Tanks

Emissions Unit ID:	P029
Company Equipment ID:	2,700 Gallon Myers Tank 2573
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P030
Company Equipment ID:	2,700 Gallon Myers Tank 2574
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



Final Permit-to-Install and Operate
NPA COATINGS, INC.
Permit Number: P0117483
Facility ID: 1318008021
Effective Date: 10/9/2014

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 [DO/LAA] 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.



Final Permit-to-Install and Operate
NPA COATINGS, INC.
Permit Number: P0117483
Facility ID: 1318008021
Effective Date: 10/9/2014

B. Facility-Wide Terms and Conditions



Final Permit-to-Install and Operate

NPA COATINGS, INC.

Permit Number: P0117483

Facility ID: 1318008021

Effective Date: 10/9/2014

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.



Final Permit-to-Install and Operate
NPA COATINGS, INC.
Permit Number: P0117483
Facility ID: 1318008021
Effective Date: 10/9/2014

C. Emissions Unit Terms and Conditions



1. Emissions Unit Group – 2 Mixing Tanks: P029, P030

EU ID	Operations, Property and/or Equipment Description
P029	2,700 Gallon mixing tank, controlled by Pulse Jet Baghouse, where raw materials are added, mixed, product is milled and transferred to containers
P030	2,700 Gallon mixing tank, controlled by Pulse Jet Baghouse, where raw materials are added, mixed, product is milled and transferred to containers

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. g)(1)

(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. None.

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.	Particulate emissions (PE) from each emissions unit shall not exceed 0.021 ton per month averaged over a 12-month rolling period. Volatile organic compound (VOC) emissions from each emissions unit shall not exceed 0.144 ton per month averaged over a 12-month rolling period. See b.)(2)a., b)(2)d., and b)(2)e. below.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/2006.	See b)(2)b. below.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-17-07(A)	Visible particulate emissions from the stack serving these emissions unit shall not exceed 20 percent opacity as a six-minute average.
d.	OAC rule 3745-17-07(B)	Visible emissions of fugitive dust from these emissions unit shall not exceed 20 percent opacity as a three-minute average.
e.	OAC rule 3745-17-08(B)(3)	See b)(2)c. below.
f.	OAC 3745-17-11(B)(1)	<p>Particulate emissions (PE) from each emissions unit shall not exceed 1.925 lbs/hr.</p> <p>Currently, the particulate emission limit specified by this rule is less stringent than the particulate emission limit established under OAC rule 3745-31-05(A)(3).</p> <p>This rule applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan</p>

(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 emission 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



BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC and PM emissions from the emissions units since the potential to emit for VOC and PM is less than ten tons per year.

- c. The permittee shall employ reasonably available control measures that shall include but not be limited to the installation and use of hoods, fans, and/or other equipment to adequately enclose, contain, capture, vent, and control fugitive dust from these emissions units and shall meet the following requirements:
 - i. the collection efficiency shall be sufficient to minimize or eliminate visible emissions of fugitive dust at the points of capture to the extent possible with good engineering design.
- d. The mixers operate as a batch operation with a maximum of 162.22 batches a year at 54 hours of batch cycle time.
- e. The tons/month VOC and PM emission limitations for these emissions units were established to reflect the maximum potential to emit. Therefore, it is not necessary to establish monitoring, recordkeeping or reporting for these emission limits.

c) Operational Restrictions

- (1) The mixers shall be vented to the baghouse at all times during operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform weekly checks, when the emissions unit is in operation and, when the weather conditions allow, for any visible particulate emissions from the exhaust stack and for any visible emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed from any points of capture and/or the stack, the permittee shall also note the following in the operations log:
 - a. the location and color of the emissions;
 - b. the total duration of any visible emissions incident; and
 - c. any corrective actions taken to eliminate the visible emissions.

e) Reporting Requirements

- (1) The reports required by this permit may be submitted electronically through the Ohio EPA's "e-Business Center: Air Services" online web portal; or they may be mailed as a hard copy to the Cleveland Division of Air Quality.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Cleveland Division of Air Quality 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.



- (3) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in d)(1) above:
- a. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit;
 - b. all days during which any visible particulate emissions were observed from the stack serving this emission unit; and
 - c. any corrective actions taken to eliminate the visible emissions

f) Testing Requirements

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

a. Emission Limitation:

The VOC emissions from each emissions unit shall not exceed 0.144 ton per month averaged over a 12-month rolling period.

Applicable Compliance Method:

The emission limitation was based on the following equations from the Emission Improvement Inventory Program (EIIP), Volume II, Chapter 8, Section 4 for determining potential to emit using the maximum amount of material processed per batch:

Material Loading and Unloading:

$$E_{loading/unloading} = 12.46 \times \frac{S * P * M * Q}{T}$$

Where:

- S = Saturation factor;
 - P = Vapor pressure of material loaded at temperature "T";
 - M = Vapor molecular weight (lb/lb-mol);
 - Q = Volume of material loaded (10³ gals/batch); and
 - T = Temperature of liquid loaded (°R)
- $E_{loading/unloading}$ = lbs VOC/batch (loading/unloading loss)

$$E_{loading} = (12.46 \times (1.45 \times 8.29 \times 106.17 \times 0.51)/512) \times 166.22 \text{ batches/yr} = 2572.81 \text{ lbs VOC/ yr} = 1.29 \text{ TPY VOC}$$

$$E_{unloading} = (12.46 \times (0.6 \times 0.026 \times 124.01 \times 2.70)/512) \times 162.22 \text{ batches/yr} = 20.62 \text{ lbs VOC/yr} = 0.01 \text{ TPY VOC}$$

Surface Evaporation During Mixing:



$$E_{\text{mixing}} = \frac{M_x * K_x * A * P_x * 3,600 * H}{R * T}$$

Where:

M_x = Vapor molecular weight (lb/lb-mol);

K_x = Gas-Phase mass transfer coefficient;

A = Surface area of exposure (ft²);

P_x = Vapor pressure (psia);

R = Universal gas constant at 1 atmosphere of pressure; and

T = Temperature of the liquid.

E_{mixing} = lbs VOC/batch

$$E_{\text{mixing}} = \frac{124.01 \text{ lb/lb mol} \times 0.0117 \text{ ft/sec} \times 4.0 \text{ ft}^2 \times 0.026 \text{ psia} \times 3,600 \text{ sec/hr} \times 54 \text{ hr}}{10.73 \text{ psia ft}^3/\text{°R lb mole} \times 512.0 \text{ °R}} \times$$

$$162.22 \frac{\text{batches}}{\text{yr}} = 863.01 \text{ lbs VOC/yr} = 0.43 \text{ TPY VOC}$$

Total Emissions:

$$E_{\text{total}} = (E_{\text{loading}}) + (E_{\text{unloading}}) + (E_{\text{mixing}}) = (1.29 + 0.01 + 0.43) \text{ TPY} = 1.73 \text{ TPY VOC}$$

Divide the annual emissions by 12 months to determine the monthly average.

b. Emission Limitation:

Particulate emissions (PE) shall not exceed 0.021 ton per month averaged over a 12-month rolling period

Applicable Compliance Method

The emissions limitation was calculated by multiplying the maximum amount of material processed per batch (17.334 tons/batch) and multiplying by 43% solid content of the total batch product multiplied by 20 lbs/ton PM emissions factor (from AP-42 Table 6.4-1 uncontrolled emission factors for paint and varnish manufacturing), then divided by 2000 lbs/ton to obtain the tons/batch emissions. Then multiply by 162.22 batches/yr at control efficiency of 98%, and then divided by 12 months/yr to obtain the monthly emission rate.

c. Emissions Limitation:

PE shall not exceed 1.921 lbs/hr at maximum operation rate of 642 lbs/hr.

Applicable Compliance Method:

If required, compliance with the emission limitation shall be demonstrated by performing a stack test using U.S.EPA Methods 1- 5 of 40 CFR Part 60, Appendix A.



d. Emission Limitation:

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

Applicable Compliance Method:

If required, compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9 of 40 CFR Part 60, Appendix A.

e. Emission Limitation

Visible emissions of fugitive dust from these emissions unit shall not exceed 20 percent opacity as a three-minute average.

Applicable Compliance Method

If required, compliance with the visible fugitive dust limitation shall be determined through visible emissions observations performed in accordance with U.S.EPA Method 9 of 40 CFR, Part 60, Appendix A.

g) Miscellaneous Requirements

- (1) 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 PTIO P0117483 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 or PTI.