State of Ohio Environmental Protection Agency

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

Street Address: Mailing Address: Lazarus Gov. Center
Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329

**Application No:** 14-05390

**DATE:** 6/17/2003

Noveon Hilton Davis
Thomas Eickhoff
2235 Langdon Farm Road
Cincinnati, OH 452374790

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

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

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

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, Ohio 43215

Sincerely,

Michael W. Ahern

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

**CC: USEPA** **HCDES**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Permit To Install** **Issue Date: 6/17/2003**
**Terms and Conditions** **Effective Date: 6/17/2003**

**FINAL PERMIT TO INSTALL 14-05390**

| | |
|---|---|
| Application Number: | 14-05390 |
| APS Premise Number: | 1431070039 |
| Permit Fee: | **$6400** |
| Name of Facility: | Noveon Hilton Davis |
| Person to Contact: | Thomas Eickhoff |
| Address: | 2235 Langdon Farm Road<br>Cincinnati, OH 452374790 |

Location of proposed air contaminant source(s) [emissions unit(s)]:
**2235 Langdon Farm Road**
**Cincinnati Ohio, Ohio**

Description of proposed emissions unit(s):
**Various emissions units to produce Milled/Dispersed Pigments; (8)ball mills, (11) high speed dispersers, (4) drais mills, (3) pony mixers, and (3) roll mills.**

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

## Part I - GENERAL TERMS AND CONDITIONS

### A. State and Federally Enforceable Permit To Install General Terms and Conditions

#### 1. Monitoring and Related Recordkeeping and Reporting Requirements

a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

i. The date, place (as defined in the permit), and time of sampling or measurements.

ii. The date(s) analyses were performed.

iii. The company or entity that performed the analyses.

iv. The analytical techniques or methods used.

v. The results of such analyses.

vi. The operating conditions existing at the time of sampling or measurement.

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

c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

ii. Quarterly written reports of (i) any deviations from federally enforceable <u>emission limitations</u>, <u>operational restrictions</u>, <u>and control device operating parameter limitations</u>, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous

calendar quarters. See B.9 below if no deviations occurred during the quarter.

iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

**2. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.
Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

**3. Risk Management Plans**

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

**4. Title IV Provisions**

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

**5. Severability Clause**

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

**6. General Requirements**

a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d. This permit does not convey any property rights of any sort, or any exclusive privilege.

e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

**7. Fees**

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

**8. Federal and State Enforceability**

Only those terms and conditions designated in this permit as federally enforceable, that are

required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

**9. Compliance Requirements**

a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.

iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

**10. Permit To Operate Application**

a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

**11. Best Available Technology**

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

**12. Air Pollution Nuisance**

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

## B. State Only Enforceable Permit To Install General Terms and Conditions

### 1. Compliance Requirements

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

### 2. Reporting Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

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

### 3. Permit Transfers

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

### 4. Termination of Permit To Install

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

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

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

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

**6. Public Disclosure**

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

**7. Applicability**

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

**8. Construction Compliance Certification**

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

**9. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)**

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

## C. Permit To Install Summary of Allowable Emissions

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

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

| Pollutant | Tons Per Year |
|---|---|
| VOC | 39.9 |
| PM / PM10 | 8.04 |

## Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

### A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

None

### B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

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

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

| Operations, Property, and/or Equipment | Applicable Rules/Requirements |
|---|---|
| | OAC rule 3745-17-11(B)(1) |
| P476 - Ball Mill A with baghouse, equipment ID 34-21-104R | OAC rule 3745-31-05 (A)(3) |
| | OAC rule 3745-17-07(A)(1) |
| | OAC rule 3745-31-05 (D) |

| Applicable Emissions Limitations/Control Measures | |
|---|---|
| Particulate matter - particulate matter less than 10 microns (PM-PM10) emissions shall not exceed 0.01 pound (lb)/hour* (hr) and 0.05 ton per year (TPY); volatile organic compound (VOC) emissions shall not exceed 1.73 lbs/hr* and 7.56 TPY.<br><br>See Term A.2.a<br><br>*The hourly emissions limitation is based on the maximum capacity of the equipment and thus, no hourly record keeping is required.<br><br>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-31-05(D).<br><br>VOC emissions shall not exceed 39.9 TPY, based on a rolling, 12-month summation.<br><br>See Terms A.2.b and A.2.c<br><br>The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A)(3). | Visible particulate emissions from any stack shall not exceed 20% opacity, as a six- minute average, except as specified by rule. |

**2. Additional Terms and Conditions**

**2.a** Compliance with OAC rule 3745-31-05(A)(3) (BAT) shall be demonstrated by the use of a baghouse for control of particulate emissions, use of covers for control of volatile organic compound emissions, VOC input limitations and compliance with the Ohio Air Toxics Policy.

**2.b** The total combined emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation and the permittee will use existing records along with records required in this permit to demonstrate compliance with these limitations upon issuance of the permit.

**2.c** The total VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined shall not exceed 2660 tons per year based upon a rolling, 12-month summation of the VOC input.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the VOC input levels specified in the following table:

| Month(s) | Maximum Allowable VOC Input (Tons) |
|---|---|
| 1 | 444 |
| 1-2 | 888 |
| 1-3 | 1110 |
| 1-4 | 1332 |
| 1-5 | 1554 |
| 1-6 | 1776 |
| 1-7 | 1998 |
| 1-8 | 2220 |
| 1-9 | 2442 |
| 1-10 | 2660 |
| 1-11 | 2660 |
| 1-12 | 2660 |

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual VOC input limit shall be based upon a rolling, 12-month summation of the VOC input.

## II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range established either during the most recent emission test that demonstrated that the emissions unit was in compliance or by the manufacturer's written recommendation while the emissions unit is in operation.

## III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month:

   a. The identification of each batch made (product code).

   b. The batch size, in pounds.

   c. The total pigment content of each batch, in pounds.

   d. The liquid volatile organic compound input for each batch, in pounds.

   e. The individual organic HAP content of each batch, in pounds of individual HAP.

   f. The total combined organic HAP content of each batch, in pounds of combined HAP [sum of all the individual organic HAP contents from (e)].

   g. If any inorganic HAP materials are employed, the individual inorganic HAP content of each batch, in pounds of individual HAP.

   h. If any inorganic HAP materials are employed, the total combined inorganic HAP content of each batch, in pounds of combined HAP [sum of all the individual inorganic HAP contents from (g)].

   i. The liquid organic cleanup material employed, in pounds.

   j. If any organic HAP containing cleanup materials are employed, the individual organic HAP content of each cleanup material, in percent by weight of individual HAP.

   k. If any organic HAP containing cleanup materials are employed, the total combined organic HAP content of each cleanup material, in percent by weight of combined HAP [sum of all the individual organic HAP contents from (j)].

l. The total monthly emissions, in pounds, calculated as below:

Monthly VOC emissions =
sum of [(d) * 0.015 lb VOC emissions/lb VOC input] for all batches made per month + (i).

Monthly single HAP emissions for each HAP =
sum of [(e) * 0.015 lb HAP emissions/lb HAP] for all batches made per month + sum of [(g) * 0.001 lb HAP emissions/lb HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of (i * j) for all liquid organic cleanup materials used.

Monthly total HAP emissions =
sum of [(f) * 0.015 lb HAP emissions/lb HAP ] for all batches made + sum of [(h) * 0.001 lb HAP emissions/lb HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of all (i * k) for all liquid organic cleanup materials used.

m. The rolling, 12-month summation of VOC emissions, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined calculated as below:

Rolling, 12-month summation of VOC emissions = (monthly VOC emissions from (l) + sum of monthly VOC emissions from previous 11 calendar months)/2000.

2. The permittee shall maintain monthly records of the following:

a. The total monthly VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined, in tons.

b. The rolling, 12-month summation of the VOC input, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined calculated as below:

Rolling, 12-month summation of VOC input = (monthly VOC input from (a) + sum of monthly VOC input from previous 11 calendar months)

Also during the first 12 calendar months of operation following issuance of this permit, the

permittee shall record the cumulative VOC input for each calendar month.

c. The monthly single HAP emissions from all facility emissions units combined, in pounds, for each single HAP.

d. The rolling, 12-month summation of single HAP emissions, in tons, from all facility emission units combined calculated as below for each single HAP:

Rolling, 12-month summation of single HAP emissions = (monthly single HAP emissions from (c) + sum of monthly single HAP emissions from previous 11 calendar months)/2000.

e. The monthly total HAPs (sum of all single HAPs) emissions from all facility emissions units combined, in pounds.

f. The rolling, 12-month summation of total HAPs (sum of all single HAPs) emissions, in tons, from all facility emissions units combined calculated as below:

Rolling, 12-month summation of total HAPs (sum of all single HAPs) emissions = (monthly total HAPs emissions from (e) + sum of monthly total HAPs emissions from previous 11 calendar months)/2000.

3. The permittee shall collect and record the following information for the purpose of determining annual VOC emissions:

a. The identification of each batch made (product code).

b. The batch size, in pounds.

c. The liquid volatile organic compound input for each batch, in pounds.

d. The liquid volatile organic compound cleanup material employed, in pounds.

e. The total VOC emissions from all batches produced and cleanup materials employed, in pounds or tons.

4. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.

## IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for VOC emissions and VOC input for emissions units

P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative VOC input levels.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month HAP emission limitations for the facility as set forth in term A.2.b. The permittee shall submit quarterly reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance.

3. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in term A.II.1.

4. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

5. The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

## V. Testing Requirements

1. The permittee may determine the VOC content of materials based on formulation data, and may rely on volatile matter content data provided by material suppliers. In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR Part 60, Subpart A, Test Methods 24 or 24A shall be used unless the permittee can demonstrate to the satisfaction of the agency that the formulation data is correct.

2. Emission limitation:
   Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a 6-minute average, except as specified by rule.

   Applicable Compliance Method:
   Compliance with the visible particulate emission limitation shall be demonstrated by the methods outlined in 40 CFR Part 60, Appendix A, Method 9.

3. Emission limitation:
   1.73 lbs. of VOC/hr

Applicable compliance method:
Compliance with the VOC emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.4-1 (5/83), Uncontrolled emission factors for paint and varnish manufacturing.

4. Emission limitation:
7.56 TPY of VOC

Applicable Compliance Method:
Compliance shall be determined based on record keeping in Term A.III.3.

5. Emission limitation:
39.9 TPY VOC, based upon a rolling, 12-month summation from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined and 9.9 TPY for single HAP and 24.9 TPY for combined HAPs (sum of all single HAPs) from the facility.

Applicable Compliance Method:
Compliance shall be determined based on record keeping in Terms A.III.1 and A.III.2.

6. Emission limitation
0.01 lb/hr of PM/PM-10

Applicable compliance method:
Compliance with the particulate and PM-10 emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.7-1 (5/83), Emission factors for printing ink manufacturing, and a fabric filter control factor of 95 per cent control efficiency.

7. Emission limitation
0.05 TPY PM/PM10

Applicable compliance method:
Compliance with the particulate and PM-10 emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.7-1 (5/83), Emission factors for printing ink manufacturing, multiplied by the sum of all pigment usage totals in term A.III.1.c, then multiplied by (1-.95)( fabric filter control efficiency).

8. Compliance with the VOC input limit in term A.I.2.c shall be determined by the record keeping in term A.III.2.

## VI. Miscellaneous Requirements

None

**B. State Only Enforceable Section**

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

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

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| P476 - Ball Mill A with baghouse, equipment ID 34-21-104R | | |

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

1. The permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

   The following summarizes the results of the modeling for the "worst case" pollutant(s):

   Pollutant: Xylene

TLV (ug/m3): 434,192

Maximum Hourly Emission Rate (lbs/hr): 36.1
(Emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507, combined)

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 6997

MAGLC (ug/m3): 10,338

Physical changes to or in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

a. Changes in the composition of the materials used (typically for coatings or cleanup materials),or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s)to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

a. A description of the parameters changed(composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. When the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

## IV. Reporting Requirements

None

## V. Testing Requirements

None

## VI. Miscellaneous Requirements

None

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

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

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

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | |
|---|---|---|
| P477 - Ball Mill B with baghouse equipment ID 34-21-103R | OAC rule 3745-31-05 (A)(3) | OAC rule 3745-17-11(B)(1) |
| | | OAC rule 3745-17-07(A)(1) |
| | OAC rule 3745-31-05 (D) | |

| Applicable Emissions Limitations/Control Measures | |
|---|---|
| Particulate matter-particulate matter less than 10 microns (PM -PM10) emissions shall not exceed 0.01 pound (lb)/ hour (hr*) and 0.05 of TPY PM-PM10; volatile organic compound (VOC) emissions shall not exceed 1.73 lbs/hr* and 7.56 TPY.<br><br>See Term A.2.a<br><br>*The hourly emissions limitation is based on the maximum capacity of the equipment and thus, no hourly record keeping is required.<br><br>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-31-05(D).<br><br>VOC emissions shall not exceed 39.9 TPY based on a rolling, 12-month summation<br><br>See Terms A.2.b, and A.2.c | The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).<br><br>Visible particulate emissions from any stack shall not exceed 20% opacity, as a six- minute average, except as specified by rule. |

**2. Additional Terms and Conditions**

**2.a** Compliance with OAC rule 3745-31-05(A)(3) (BAT) shall be demonstrated by the use of a baghouse for control of particulate emissions, use of covers for control of volatile organic compound emissions, VOC input limitations and compliance with the Ohio Air Toxics Policy.

**2.b** The total combined emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation. The permittee will use existing records along with records required in this permit to demonstrate compliance with this limit upon issuance of the permit.

**2.c** The total VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined shall not exceed 2660 tons per year based upon a rolling, 12-month summation of the VOC input.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the VOC input levels specified in the following table:

| Month(s) | Maximum Allowable VOC Input (Tons) |
|---|---|
| 1 | 444 |
| 1-2 | 888 |
| 1-3 | 1110 |
| 1-4 | 1332 |
| 1-5 | 1554 |
| 1-6 | 1776 |
| 1-7 | 1998 |
| 1-8 | 2220 |
| 1-9 | 2442 |
| 1-10 | 2660 |
| 1-11 | 2660 |
| 1-12 | 2660 |

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual VOC input limit shall be based upon a rolling, 12-month summation of the VOC input.

## II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range established either during the most recent emission test that demonstrated that the emissions unit was in compliance or by the manufacturer's written recommendation while the emissions unit is in operation.

## III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month:

   a. The identification of each batch made (product code).

   b. The batch size, in pounds.

   c. The total pigment content of each batch, in pounds.

   d. The liquid volatile organic compound input for each batch, in pounds.

   e. The individual organic HAP content of each batch, in pounds of individual HAP.

   f. The total combined organic HAP content of each batch, in pounds of combined HAP [sum of all the individual organic HAP contents from (e)].

   g. If any inorganic HAP materials are employed, the individual inorganic HAP content of each batch, in pounds of individual HAP.

   h. If any inorganic HAP materials are employed, the total combined inorganic HAP content of each batch, in pounds of combined HAP [sum of all the individual inorganic HAP contents from (g)].

   i. The liquid organic cleanup material employed, in pounds.

   j. If any organic HAP containing cleanup materials are employed, the individual organic HAP content of each cleanup material, in percent by weight of individual HAP.

   k. If any organic HAP containing cleanup materials are employed, the total combined organic HAP content of each cleanup material, in percent by weight of combined HAP [sum of all the individual organic HAP contents from (j)].

l. The total monthly emissions, in pounds, calculated as below:

Monthly VOC emissions =
sum of [(d) * 0.015 lb VOC emissions/lb VOC input] for all batches made per month + (i).

Monthly single HAP emissions for each HAP =
sum of [(e) * 0.015 lb HAP emissions/lb HAP] for all batches made per month + sum of [(g) * 0.001 lb HAP emissions/lb HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of (i * j) for all liquid organic cleanup materials used.

Monthly total HAP emissions =
sum of [(f) * 0.015 lb HAP emissions/lb HAP ] for all batches made + sum of [(h) * 0.001 lb HAP emissions/lb HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of all (i * k) for all liquid organic cleanup materials used.

m. The rolling, 12-month summation of VOC emissions, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined calculated as below:

Rolling, 12-month summation of VOC emissions = (monthly VOC emissions from (l) + sum of monthly VOC emissions from previous 11 calendar months)/2000.

2. The permittee shall maintain monthly records of the following:

a. The total monthly VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined, in tons.

b. The rolling, 12-month summation of the VOC input, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined calculated as below:

Rolling, 12-month summation of VOC input = (monthly VOC input from (a) + sum of monthly VOC input from previous 11 calendar months).

Also during the first 12 calendar months of operation following issuance of this permit, the permittee shall record the cumulative VOC input for each calendar month.

c. The monthly single HAP emissions from all facility emissions units combined, in pounds, for each single HAP.

d. The rolling, 12-month summation of single HAP emissions, in tons, from all facility

emission units combined calculated as below for each single HAP:

Rolling, 12-month summation of single HAP emissions = (monthly single HAP emissions from (c) + sum of monthly single HAP emissions from previous 11 calendar months)/2000.

e. The monthly total HAPs (sum of all single HAPs) emissions from all facility emissions units combined, in pounds.

f. The rolling, 12-month summation of total HAPs (sum of all single HAPs) emissions, in tons, from all facility emissions units combined calculated as below:

Rolling, 12-month summation of total HAPs (sum of all single HAPs) emissions = (monthly total HAPs emissions from (e) + sum of monthly total HAPs emissions from previous 11 calendar months)/2000.

3. The permittee shall collect and record the following information for the purpose of determining annual VOC emissions:

a. The identification of each batch made (product code).

b. The batch size, in pounds.

c. The liquid volatile organic compound input for each batch, in pounds.

d. The liquid volatile organic cleanup compound material employed, in pounds.

e. The total VOC emissions from all batches produced and cleanup materials employed, in pounds or tons.

4. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.

## IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for VOC emissions and VOC input for emissions units

P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative VOC input levels.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month HAP emission limitations for the facility as set forth in term A.2.b. The permittee shall submit quarterly reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance.

3. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in term A.II.1.

4. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

5. The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

## V. Testing Requirements

1. The permittee may determine the VOC content of materials based on formulation data, and may rely on volatile matter content data provided by material suppliers. In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR Part 60, Subpart A, Test Methods 24 or 24A shall be used unless the permittee can demonstrate to the satisfaction of the agency that the formulation data is correct.

2. Emission limitation:
   Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a 6-minute average, except as specified by rule.

   Applicable Compliance Method:
   Compliance with the visible particulate emission limitation shall be demonstrated by the methods outlined in 40 CFR Part 60, Appendix A, Method 9.

3. Emission limitation:
   1.73 lbs. of VOC/hr

Applicable compliance method:
Compliance with the VOC emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.4-1 (5/83), Uncontrolled emission factors for paint and varnish manufacturing.

4. Emission limitation:
7.56 TPY of VOC

Applicable Compliance Method:
Compliance shall be determined based on record keeping in Term A.III.3.

5. Emission limitation:
39.9 TPY VOC, based upon a rolling, 12-month summation from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined and 9.9 TPY for single HAP and 24.9 TPY for combined HAPs (sum of all single HAPs) from the facility.

Applicable Compliance Method:
Compliance shall be determined based on record keeping in Terms A.III.1 and A.III.2.

6. Emission limitation
0.01 lb PM /hr

Applicable compliance method:
Compliance with the particulate and PM-10 emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.7-1 (5/83), Emission factors for printing ink manufacturing, and a fabric filter control factor of 95 per cent control efficiency.

7. Emission limitation
0.05 TPY PM /PM10

Applicable compliance method:
Compliance with the particulate and PM-10 emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.7-1 (5/83), Emission factors for printing ink manufacturing, multiplied by the sum of all pigment usage totals in term A.III.1.c, then multiplied by (1-.95)( fabric filter control efficiency).

8. Compliance with the VOC input limit in term A.I.2.c shall be determined by the record keeping in term A.III.2.

## VI. Miscellaneous Requirements

None

**B. State Only Enforceable Section**

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

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

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| P477 - Ball Mill B, with baghouse equipment ID 34-21-103R | | |

**2. Additional Terms and Conditions**

**2.a** None

**II. Operational Restrictions**

None

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

1. The permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

   The following summarizes the results of the modeling for the "worst case" pollutant(s):

   Pollutant: Xylene

TLV (ug/m3): 434,192

Maximum Hourly Emission Rate (lbs/hr): 36.1
(Emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507, combined)

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 6997

MAGLC (ug/m3): 10,338

Physical changes to or in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

a. Changes in the composition of the materials used (typically for coatings or cleanup materials),or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s)to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

a. Description of the parameters changed(composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. When the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

## IV. Reporting Requirements

None

## V. Testing Requirements

None

## VI. Miscellaneous Requirements

None

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

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

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

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | |
|---|---|---|
| P478 - Ball Mill C with baghouse, equipment ID 34-21-107R | OAC rule 3745-31-05 (A)(3) | OAC rule 3745-17-11(B)(1) |
| | | OAC rule 3745-17-07(A)(1) |
| | OAC rule 3745-31-05 (D) | |

| Applicable Emissions Limitations/Control Measures | |
|---|---|
| Particulate matter-particulate matter less than 10 microns (PM-PM10) emissions shall not exceed 0.01 pound (lb)/hour (hr*) and 0.05 ton per year (TPY); volatile organic compound (VOC) emissions shall not exceed 0.47 lb/hr* and 2.08 TPY.<br><br>See Term A.2.a<br><br>*The hourly emissions limitation is based on the maximum capacity of the equipment and thus, no hourly record keeping is required.<br><br>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-31-05 (D).<br><br>VOC emissions shall not exceed 39.9 TPY based on a rolling, 12-month summation.<br><br>See Terms A.2.b, and A.2.c<br><br>The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).<br><br>Visible particulate emissions | from any stack shall not exceed 20% opacity, as a six- minute average, except as specified by rule. |

**2. Additional Terms and Conditions**

**2.a** Compliance with OAC rule 3745-31-05(A)(3) (BAT) shall be demonstrated by the use of a baghouse for control of particulate emissions, use of covers for control of volatile organic compound emissions, VOC input limitations and compliance with the Ohio Air Toxics Policy.

**2.b** The total combined emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation and the permittee will use existing records along with records required in this permit to demonstrate compliance with this limit upon issuance of the permit.

**2.c** The total VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined shall not exceed 2660 tons per year based upon a rolling, 12-month summation of the VOC input.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the VOC input levels specified in the following table:

| Month(s) | Maximum Allowable VOC Input (Tons) |
|---|---|
| 1 | 444 |
| 1-2 | 888 |
| 1-3 | 1110 |
| 1-4 | 1332 |
| 1-5 | 1554 |
| 1-6 | 1776 |
| 1-7 | 1998 |
| 1-8 | 2220 |
| 1-9 | 2442 |
| 1-10 | 2660 |
| 1-11 | 2660 |
| 1-12 | 2660 |

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual VOC input limit shall be based upon a rolling, 12-month summation of the VOC input.

## II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range established either during the most recent emission test that demonstrated that the emissions unit was in compliance or by the manufacturer's written recommendation while the emissions unit is in operation.

## III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month:

   a. The identification of each batch made (product code).

   b. The batch size, in pounds.

   c. The total pigment content of each batch, in pounds.

   d. The liquid volatile organic compound input for each batch, in pounds.

   e. The individual organic HAP content of each batch, in pounds of individual HAP.

   f. The total combined organic HAP content of each batch, in pounds of combined HAP [sum of all the individual organic HAP contents from (e)].

   g. If any inorganic HAP materials are employed, the individual inorganic HAP content of each batch, in pounds of individual HAP.

   h. If any inorganic HAP materials are employed, the total combined inorganic HAP content of each batch, in pounds of combined HAP [sum of all the individual inorganic HAP contents from (g)].

   i. The liquid organic cleanup material employed, in pounds.

   j. If any organic HAP containing cleanup materials are employed, the individual organic HAP content of each cleanup material, in percent by weight of individual HAP.

   k. If any organic HAP containing cleanup materials are employed, the total combined organic

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HAP content of each cleanup material, in percent by weight of combined HAP [sum of all the individual organic HAP contents from (j)].

l. The total monthly emissions, in pounds, calculated as below:

Monthly VOC emissions =
sum of [(d) * 0.015 lb VOC emissions/lb VOC input] for all batches made per month + (i)

Monthly single HAP emissions for each HAP =
sum of [(e) * 0.015 lb HAP emissions/lb HAP] for all batches made per month + sum of [(g) * 0.001 lb HAP emissions/lb HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of (i * j) for all liquid organic cleanup materials used.

Monthly total HAP emissions =
sum of [(f) * 0.015 lb HAP emissions/lb HAP ] for all batches made + sum of [(h) * 0.001 lb HAP emissions/lb HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of all (i * k) for all liquid organic cleanup materials used.

m. The rolling, 12-month summation of VOC emissions, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined calculated as below:

Rolling, 12-month summation of VOC emissions = (monthly VOC emissions from (l) + sum of monthly VOC emissions from previous 11 calendar months)/2000.

2. The permittee shall maintain monthly records of the following:

a. The total monthly VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined, in tons.

b. The rolling, 12-month summation of the VOC input, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined calculated as below:

Rolling, 12-month summation of VOC input = (monthly VOC input from (a) + sum of monthly VOC input from previous 11 calendar months)

Also during the first 12 calendar months of operation following issuance of this permit, the permittee shall record the cumulative VOC input for each calendar month.

c. The monthly single HAP emissions from all facility emissions units combined, in pounds, for each single HAP.

d. The rolling, 12-month summation of single HAP emissions, in tons, from all facility emission units combined calculated as below for each single HAP:

Rolling, 12-month summation of single HAP emissions = (monthly single HAP emissions from (c) + sum of monthly single HAP emissions from previous 11 calendar months)/2000.

e. The monthly total HAPs (sum of all single HAPs) emissions from all facility emissions units combined, in pounds.

f. The rolling, 12-month summation of total HAPs (sum of all single HAPs) emissions, in tons, from all facility emissions units combined calculated as below:

Rolling, 12-month summation of total HAPs (sum of all single HAPs) emissions = (monthly total HAPs emissions from (e) + sum of monthly total HAPs emissions from previous 11 calendar months)/2000.

3. The permittee shall collect and record the following information for the purpose of determining annual VOC emissions:

a. The identification of each batch made (product code).

b. The batch size, in pounds.

c. The liquid volatile organic compound input for each batch, in pounds.

d. The liquid volatile organic compound cleanup material employed, in pounds.

e. The total VOC emissions from all batches produced and cleanup materials employed, in pounds or tons.

4. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.

## IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for VOC emissions and VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative VOC input levels.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month HAP emission limitations for the facility as set forth in term A.2.b. The permittee shall submit quarterly reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance.

3. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in term A.II.1.

4. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

5. The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

## V. Testing Requirements

1. The permittee may determine the VOC content of materials based on formulation data, and may rely on volatile matter content data provided by material suppliers. In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR Part 60, Subpart A, Test Methods 24 or 24A shall be used unless the permittee can demonstrate to the satisfaction of the agency that the formulation data is correct.

2. Emission limitation:
   Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a 6-minute average, except as specified by rule.

   Applicable Compliance Method:
   Compliance with the visible particulate emission limitation shall be demonstrated by the methods outlined in 40 CFR Part 60, Appendix A, Method 9.

3. Emission limitation:
   0.47 lb. of VOC/hr

   Applicable compliance method:

Compliance with the VOC emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.4-1 (5/83), Uncontrolled emission factors for paint and varnish manufacturing.

4. Emission limitation:
2.08 TPY of VOC

Applicable Compliance Method:
Compliance shall be determined based on record keeping in Term A.III.3.

5. Emission limitation:
39.9 TPY VOC, based upon a rolling, 12-month summation from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined and 9.9 TPY for single HAP and 24.9 TPY for combined HAPs (sum of all single HAPs) from the facility.

Applicable Compliance Method:
Compliance shall be determined based on record keeping in Terms A.III.1 and A.III.2.

6. Emission limitation
0.01 lb of PM-PM10/hr

Applicable compliance method:
Compliance with the particulate and PM-10 emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.7-1 (5/83), Emission factors for printing ink manufacturing, and a fabric filter control factor of 95 per cent control efficiency.

7. Emission limitation
0.05 TPY of PM /PM10

Applicable compliance method:
Compliance with the particulate and PM-10 emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.7-1 (5/83), Emission factors for printing ink manufacturing, multiplied by the sum of all pigment usage totals in term A.III.1.c, then multiplied by (1-.95)( fabric filter control efficiency).

8. Compliance with the VOC input limit in term A.I.2.c shall be determined by the record keeping in term A.III.2.

## VI. Miscellaneous Requirements

None

**B. State Only Enforceable Section**

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

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

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| P478 - Ball Mill C, with baghouse equipment ID 34-21-107R | | |

**2. Additional Terms and Conditions**

**2.a** None

**II. Operational Restrictions**

None

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

1. The permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

   The following summarizes the results of the modeling for the "worst case" pollutant(s):

   Pollutant: Xylene

TLV (ug/m3): 434,192

Maximum Hourly Emission Rate (lbs/hr): 36.1
(Emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488,P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507, combined)

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 6997

MAGLC (ug/m3): 10,338

Physical changes to or in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH),"
than the lowest TLV value previously modeled;

b. Changes in the composition of the materials, or use of new materials, that would result in and increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s)to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

a. A description of the parameters changed(composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. When the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

## IV. Reporting Requirements

None

## V. Testing Requirements

None

## VI. Miscellaneous Requirements

None

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

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

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

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | |
|---|---|---|
| P479 - Ball Mill D with baghouse, equipment ID 34-21-105R | OAC rule 3745-31-05 (A)(3) | OAC rule 3745-17-11(B)(1) |
| | | OAC rule 3745-17-07(A)(1) |
| | OAC rule 3745-31-05 (D) | |

| Applicable Emissions Limitations/Control Measures | summation |
|---|---|
| Particulate matter-particulate matter less than 10 microns (PM-PM10) emissions shall not exceed 0.01lb/hour (hr*) and 0.05 ton per year (TPY); volatile organic compound (VOC) emissions shall not exceed 1.73 lbs/hr* and 7.56 TPY.<br><br>See Term A.2.a<br><br>* The hourly emissions limitation is based on the maximum capacity of the equipment and thus, no hourly record keeping is required.<br><br>The requirements of this rule also include compliance with the requirements of OAC ruled 3745-17-07(A)(1) and 3745-31-05(D).<br><br>VOC emissions shall not exceed 39.9 TPY based on a rolling, 12-month | See Terms A.2.b, and A.2.c.<br><br>The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).<br><br>Visible particulate emissions from any stack shall not exceed 20% opacity, as a six- minute average, except as specified by rule. |

**2. Additional Terms and Conditions**

**2.a** Compliance with OAC rule 3745-31-05(A)(3) (BAT) shall be demonstrated by the use of a baghouse for control of particulate emissions, use of covers for control of volatile organic compound emissions, VOC input limitations and compliance with the Ohio Air Toxics Policy.

**2.b** The total combined emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation and the permittee will use existing records along with records required in this permit to demonstrate compliance with this limit upon issuance of the permit.

**2.c** The total VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined shall not exceed 2660 tons per year based upon a rolling, 12-month summation of the VOC input.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the VOC input levels specified in the following table:

| Month(s) | Maximum Allowable VOC Input (Tons) |
|---|---|
| 1 | 444 |
| 1-2 | 888 |
| 1-3 | 1110 |
| 1-4 | 1332 |
| 1-5 | 1554 |
| 1-6 | 1776 |
| 1-7 | 1998 |
| 1-8 | 2220 |
| 1-9 | 2442 |
| 1-10 | 2660 |
| 1-11 | 2660 |
| 1-12 | 2660 |

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual VOC input limit shall be based upon a rolling, 12-month summation of the VOC input.

## II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range established either during the most recent emission test that demonstrated that the emissions unit was in compliance or by the manufacturer's written recommendation while the emissions unit is in operation.

## III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month:

   a. The identification of each batch made (product code).

   b. The batch size, in pounds.

   c. The total pigment content of each batch, in pounds.

   d. The liquid volatile organic compound input for each batch, in pounds.

   e. The individual organic HAP content of each batch, in pounds of individual HAP.

   f. The total combined organic HAP content of each batch, in pounds of combined HAP [sum of all the individual organic HAP contents from (e)].

   g. If any inorganic HAP materials are employed, the individual inorganic HAP content of each batch, in pounds of individual HAP.

   h. If any inorganic HAP materials are employed, the total combined inorganic HAP content of each batch, in pounds of combined HAP [sum of all the individual inorganic HAP contents from (g)].

   i. The liquid organic cleanup material employed, in pounds.

   j. If any organic HAP containing cleanup materials are employed, the individual organic HAP content of each cleanup material, in percent by weight of individual HAP.

   k. If any organic HAP containing cleanup materials are employed, the total combined organic HAP content of each cleanup material, in percent by weight of combined HAP [sum of all the individual organic HAP contents from (j)].

l. The total monthly emissions, in pounds, calculated as below:

VOC emissions =
sum of [(d) * 0.015 lb VOC emissions/lb VOC input] for all batches made per month + (i).

Monthly single HAP emissions for each HAP =
sum of [(e) * 0.015 lb HAP emissions/lb HAP] for all batches made per month + sum of [(g) * 0.001 lb HAP emissions/lb HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of (i * j) for all liquid organic cleanup materials used.

Monthly total HAP emissions =
sum of [(f) * 0.015 lb HAP emissions/lb HAP ] for all batches made + sum of [(h) * 0.001 lb HAP emissions/lb HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of all (i * k) for all liquid organic cleanup materials used.

m. The rolling, 12-month summation of VOC emissions, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined calculated as below:

Rolling, 12-month summation of VOC emissions = (monthly VOC emissions from (l) + sum of monthly VOC emissions from previous 11 calendar months)/2000.

2. The permittee shall maintain monthly records of the following:

a. The total monthly VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined, in tons.

b. The rolling, 12-month summation of the VOC input, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined calculated as below:

Rolling, 12-month summation of VOC input = (monthly VOC input from (a) + sum of monthly VOC input from previous 11 calendar months)

Also during the first 12 calendar months of operation following issuance of this permit, the

permittee shall record the cumulative VOC input for each calendar month.

c. The monthly single HAP emissions from all facility emissions units combined, in pounds, for each single HAP.

d. The rolling, 12-month summation of single HAP emissions, in tons, from all facility emission units combined calculated as below for each single HAP:

Rolling, 12-month summation of single HAP emissions = (monthly single HAP emissions from (c) + sum of monthly single HAP emissions from previous 11 calendar months)/2000.

e. The monthly total HAPs (sum of all single HAPs) emissions from all facility emissions units combined, in pounds.

f. The rolling, 12-month summation of total HAPs (sum of all single HAPs) emissions, in tons, from all facility emissions units combined calculated as below:

Rolling, 12-month summation of total HAPs (sum of all single HAPs) emissions = (monthly total HAPs emissions from (e) + sum of monthly total HAPs emissions from previous 11 calendar months)/2000.

3. The permittee shall collect and record the following information for the purpose of determining annual VOC emissions:

a. The identification of each batch made (product code).

b. The batch size, in pounds.

c. The liquid volatile organic compound input for each batch, in pounds.

d. The liquid volatile organic compound cleanup material employed, in pounds.

e. The total VOC emissions from all batches produced and cleanup materials employed, in pounds or tons.

4. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.

## IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for VOC emissions and VOC input for emissions units

P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative VOC input levels.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month HAP emission limitations for the facility as set forth in term A.2.b. The permittee shall submit quarterly reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance.

3. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in term A.II.1.

4. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

5. The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

## V. Testing Requirements

1. The permittee may determine the VOC content of materials based on formulation data, and may rely on volatile matter content data provided by material suppliers. In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR Part 60, Subpart A, Test Methods 24 or 24A shall be used unless the permittee can demonstrate to the satisfaction of the agency that the formulation data is correct.

2. Emission limitation:
Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a 6-minute average, except as specified by rule.

Applicable Compliance Method:
Compliance with the visible particulate emission limitation shall be demonstrated by the methods outlined in 40 CFR Part 60, Appendix A, Method 9.

3. Emission limitation:
1.73 lbs. of VOC/hr

Applicable compliance method:
Compliance with the VOC emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.4-1 (5/83), Uncontrolled emission factors for paint and varnish manufacturing.

4. Emission limitation:
7.56 TPY VOC

Applicable Compliance Method:
Compliance shall be determined based on record keeping in Term A.III.3.

5. Emission limitation:
39.9 TPY VOC, based upon a rolling, 12-month summation from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined and 9.9 TPY for single HAP and 24.9 TPY for combined HAPs (sum of all single HAPs) from the facility.

Applicable Compliance Method:
Compliance shall be determined based on record keeping in Terms A.III.1 and A.III.2.

6. Emission limitation
0.01 lb of PM-PM10/hr

Applicable compliance method:
Compliance with the particulate and PM-10 emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.7-1 (5/83), Emission factors for printing ink manufacturing, and a fabric filter control factor of 95 per cent control efficiency.

7. Emission limitation
0.05 TPY PM /PM10

Applicable compliance method:
Compliance with the particulate and PM-10 emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.7-1 (5/83), Emission factors for printing ink manufacturing, multiplied by the sum of all pigment usage totals in term A.III.1.c, then multiplied by (1-.95)( fabric filter control efficiency).

8. Compliance with the VOC input limit in term A.I.2.c shall be determined by the record keeping in term A.III.2.

## VI. Miscellaneous Requirements

None

## B. State Only Enforceable Section

## I. Applicable Emissions Limitations and/or Control Requirements

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

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| P479 - Ball Mill D with baghouse, equipment ID 34-21-105R | | |

**2. Additional Terms and Conditions**

**2.a** None

## II. Operational Restrictions

None

## III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

   The following summarizes the results of the modeling for the "worst case" pollutant(s):

   Pollutant: Xylene

TLV (ug/m3): 434,192

Maximum Hourly Emission Rate (lbs/hr): 36.1
(Emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507, combined)

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 6997

MAGLC (ug/m3): 10,338

Physical changes to or in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s)to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.

Emissions Unit ID: P479

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

a. A description of the parameters changed(composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. When the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

## IV. Reporting Requirements

None

## V. Testing Requirements

None

## VI. Miscellaneous Requirements

None

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

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

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

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | |
|---|---|---|
| | | OAC rule 3745-17-11(B)(1) |
| P480 - Ball Mill E with baghouse, equipment ID 34-21-108R | OAC rule 3745-31-05 (A)(3) | |
| | | OAC rule 3745-17-07(A)(1) |
| | OAC rule 3745-31-05 (D) | |

| Applicable Emissions Limitations/Control Measures | |
|---|---|
| Particulate matter -particulate matter less than 10 microns (PM-PM10) emissions shall not exceed 0.01 lb/hour(hr*) and 0.05 ton per year (TPY); volatile organic compound (VOC) emissions shall not exceed 0.65 lb/hr* and 2.83 TPY.<br><br>See Term A.2.a<br><br>*The hourly emissions limitation is based on the maximum capacity of the equipment and thus, no hourly record keeping is required.<br><br>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-31-05(D).<br><br>VOC emissions shall not exceed 39.9 TPY based on a rolling, 12-month summation<br><br>See Terms A.2.b, and A.2.c.<br><br>The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule | 3745-31-05 (A)(3).<br><br>Visible particulate emissions from any stack shall not exceed 20% opacity, as a six- minute average, except as specified by rule. |

**2. Additional Terms and Conditions**

**2.a** Compliance with OAC rule 3745-31-05(A)(3) (BAT) shall be demonstrated by the use of a baghouse for control of particulate emissions, use of covers for control of volatile organic compound emissions, VOC input limitations and compliance with the Ohio Air Toxics Policy.

**2.b** The total combined emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation and the permittee will use existing records along with records required in this permit to demonstrate compliance with this limit upon issuance of the permit.

**2.c** The total VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined shall not exceed 2660 tons per year based upon a rolling, 12-month summation of the VOC input.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the VOC input levels specified in the following table:

| Month(s) | Maximum Allowable VOC Input (Tons) |
|---|---|
| 1 | 444 |
| 1-2 | 888 |
| 1-3 | 1110 |
| 1-4 | 1332 |
| 1-5 | 1554 |
| 1-6 | 1776 |
| 1-7 | 1998 |
| 1-8 | 2220 |
| 1-9 | 2442 |
| 1-10 | 2660 |
| 1-11 | 2660 |
| 1-12 | 2660 |

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual VOC input limit shall be based upon a rolling, 12-month summation of the VOC input.

## II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range established either during the most recent emission test that demonstrated that the emissions unit was in compliance or by the manufacturer's written recommendation while the emissions unit is in operation.

## III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month:

   a. The identification of each batch made (product code).

   b. The batch size, in pounds.

   c. The total pigment content of each batch, in pounds.

   d. The liquid volatile organic compound input for each batch, in pounds.

   e. The individual organic HAP content of each batch, in pounds of individual HAP.

   f. The total combined organic HAP content of each batch, in pounds of combined HAP [sum of all the individual organic HAP contents from (e)].

   g. If any inorganic HAP materials are employed, the individual inorganic HAP content of each batch, in pounds of individual HAP.

   h. If any inorganic HAP materials are employed, the total combined inorganic HAP content of each batch, in pounds of combined HAP [sum of all the individual inorganic HAP contents from (g)].

   i. The liquid organic cleanup material employed, in pounds.

   j. If any organic HAP containing cleanup materials are employed, the individual organic HAP content of each cleanup material, in percent by weight of individual HAP.

   k. If any organic HAP containing cleanup materials are employed, the total combined organic HAP content of each cleanup material, in percent by weight of combined HAP [sum of all the individual organic HAP contents from (j)].

l. The total monthly emissions, in pounds, calculated as below:

Monthly VOC emissions =
sum of [(d) * 0.015 lb VOC emissions/lb VOC input] for all batches made per month + (i).

Monthly single HAP emissions for each HAP =
sum of [(e) * 0.015 lb HAP emissions/lb HAP] for all batches made per month + sum of [(g) * 0.001 lb HAP emissions/lb HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of (i * j) for all liquid organic cleanup materials used.

Monthly total HAP emissions =
sum of [(f) * 0.015 lb HAP emissions/lb HAP ] for all batches made + sum of [(h) * 0.001 lb HAP emissions/lb HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of all (i * k) for all liquid organic cleanup materials used.

m. The rolling, 12-month summation of VOC emissions, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined calculated as below:

Rolling, 12-month summation of VOC emissions = (monthly VOC emissions from (l) + sum of monthly VOC emissions from previous 11 calendar months)/2000.

2. The permittee shall maintain monthly records of the following:

a. The total monthly VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined, in tons.

b. The rolling, 12-month summation of the VOC input, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined calculated as below:

Rolling, 12-month summation of VOC input = (monthly VOC input from (a) + sum of monthly VOC input from previous 11 calendar months)

Also during the first 12 calendar months of operation following issuance of this permit, the

permittee shall record the cumulative VOC input for each calendar month.

c. The monthly single HAP emissions from all facility emissions units combined, in pounds, for each single HAP.

d. The rolling, 12-month summation of single HAP emissions, in tons, from all facility emission units combined calculated as below for each single HAP:

Rolling, 12-month summation of single HAP emissions = (monthly single HAP emissions from (c) + sum of monthly single HAP emissions from previous 11 calendar months)/2000.

e. The monthly total HAPs (sum of all single HAPs) emissions from all facility emissions units combined, in pounds.

f. The rolling, 12-month summation of total HAPs (sum of all single HAPs) emissions, in tons, from all facility emissions units combined calculated as below:

Rolling, 12-month summation of total HAPs (sum of all single HAPs) emissions = (monthly total HAPs emissions from (e) + sum of monthly total HAPs emissions from previous 11 calendar months)/2000.

3. The permittee shall collect and record the following information for the purpose of determining annual VOC emissions:

a. The identification of each batch made (product code).

b. The batch size, in pounds.

c. The liquid volatile organic compound input for each batch, in pounds.

d. The liquid volatile organic compound cleanup material employed, in pounds.

e. The total VOC emissions from all batches produced and cleanup materials employed, in pounds or tons.

4. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.

## IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the

rolling, 12-month emission limitation for VOC emissions and VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month HAP emission limitations for the facility as set forth in term A.2.b. The permittee shall submit quarterly reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance.

3. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in term A.II.1.

4. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

5. The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

## V. Testing Requirements

1. The permittee may determine the VOC content of materials based on formulation data, and may rely on volatile matter content data provided by material suppliers. In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR Part 60, Subpart A, Test Methods 24 or 24A shall be used unless the permittee can demonstrate to the satisfaction of the agency that the formulation data is correct.

2. Emission limitation:
   Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a 6-minute average, except as specified by rule.

   Applicable Compliance Method:
   Compliance with the visible particulate emission limitation shall be demonstrated by the methods outlined in 40 CFR Part 60, Appendix A, Method 9.

3. Emission limitation:
   0.65 lb. of VOC/hr

Applicable compliance method:
Compliance with the VOC emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.4-1 (5/83), Uncontrolled emission factors for paint and varnish manufacturing.

4. Emission limitation:
2.83 TPY of VOC

Applicable Compliance Method:
Compliance shall be determined based on record keeping in Term A.III.3.

5. Emission limitation:
39.9 TPY VOC, based upon a rolling, 12-month summation from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined and 9.9 TPY for single HAP and 24.9 TPY for combined HAPs (sum of all single HAPs) from the facility.

Applicable Compliance Method:
Compliance shall be determined based on record keeping in Terms A.III.1 and A.III.2.

6. Emission limitation
0.01 lb of PM-PM10/hr

Applicable compliance method:
Compliance with the particulate and PM-10 emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.7-1 (5/83), Emission factors for printing ink manufacturing, and a fabric filter control factor of 95 per cent control efficiency.

7. Emission limitation
0.05 TPY of PM /PM10

Applicable compliance method:
Compliance with the particulate and PM-10 emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.7-1 (5/83), Emission factors for printing ink manufacturing, multiplied by the sum of all pigment usage totals in term A.III.1.c, then multiplied by (1-.95)( fabric filter control efficiency).

8. Compliance with the VOC input limit in term A.I.2.c shall be determined by the record keeping in term A.III.2.

## VI. Miscellaneous Requirements

None

**B. State Only Enforceable Section**

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

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

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| P480 - Ball Mill E with baghouse, equipment ID 34-21-108R | | |

**2. Additional Terms and Conditions**

**2.a** None

**II. Operational Restrictions**

None

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

1. The permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

   The following summarizes the results of the modeling for the "worst case" pollutant(s):

   Pollutant: Xylene

TLV (ug/m3): 434,192

Maximum Hourly Emission Rate (lbs/hr): 36.1
(Emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507, combined)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 6997

MAGLC (ug/m3): 10,338

Physical changes to or in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

a Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s)to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

a Description of the parameters changed(composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. Documentation of its evaluation and determination that the changed emissions unit still

satisfies the "Air Toxic Policy"; and

c. When the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

## IV. Reporting Requirements

None

## V. Testing Requirements

None

## VI. Miscellaneous Requirements

None

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

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

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

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | |
|---|---|---|
| | | OAC rule 3745-17-11(B)(1) |
| P481 - Ball Mill F with baghouse, equipment ID 34-21-101R | OAC rule 3745-31-05 (A)(3) | |
| | | OAC rule 3745-17-07(A)(1) |
| | OAC rule 3745-31-05 (D) | |

| Applicable Emissions Limitations/Control Measures | |
|---|---|
| Particulate matter-particulate matter less than 10 microns (PM-PM10) emissions shall not exceed 0.01 lb /hour (hr*) and 0.05 ton per year (TPY); volatile organic compound (VOC) emissions shall not exceed 3.45 lbs/hr*, and 15.11TPY.<br><br>See Term A.2.a<br><br>*The hourly emissions limitation is based on the maximum capacity of the equipment and thus, no hourly record keeping is required.<br><br>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-31-05(D).<br><br>VOC emissions shall not exceed 39.9 TPY based on a rolling, 12-month summation | See Term A.2.b and A.2.c<br><br>The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).<br><br>Visible particulate emissions from any stack shall not exceed 20% opacity, as a six- minute average, except as specified by rule. |

**2. Additional Terms and Conditions**

**2.a** Compliance with OAC rule 3745-31-05(A)(3) (BAT) shall be demonstrated by the use of a baghouse for control of particulate emissions, use of covers for control of volatile organic compound emissions, VOC input limitations and compliance with the Ohio Air Toxics Policy.

**2.b** The total combined emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation and the permittee will use existing records along with records required in this permit to demonstrate compliance with this limit upon issuance of the permit.

**2.c** The total VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined shall not exceed 2660 tons per year based upon a rolling, 12-month summation of the VOC input.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the VOC input levels specified in the following table:

| Month(s) | Maximum Allowable VOC Input (Tons) |
|---|---|
| 1 | 444 |
| 1-2 | 888 |
| 1-3 | 1110 |
| 1-4 | 1332 |
| 1-5 | 1554 |
| 1-6 | 1776 |
| 1-7 | 1998 |
| 1-8 | 2220 |
| 1-9 | 2442 |
| 1-10 | 2660 |
| 1-11 | 2660 |
| 1-12 | 2660 |

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual VOC input limit shall be based upon a rolling, 12-month summation of the VOC input.

## II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range established either during the most recent emission test that demonstrated that the emissions unit was in compliance or by the manufacturer's written recommendation while the emissions unit is in operation.

## III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month:

   a. The identification of each batch made (product code).

   b. The batch size, in pounds.

   c. The total pigment content of each batch, in pounds.

   d. The liquid volatile organic compound input for each batch, in pounds.

   e. The individual organic HAP content of each batch, in pounds of individual HAP.

   f. The total combined organic HAP content of each batch, in pounds of combined HAP [sum of all the individual organic HAP contents from (e)].

   g. If any inorganic HAP materials are employed, the individual inorganic HAP content of each batch, in pounds of individual HAP.

   h. If any inorganic HAP materials are employed, the total combined inorganic HAP content of each batch, in pounds of combined HAP [sum of all the individual inorganic HAP contents from (g)].

   i. The liquid organic cleanup material employed, in pounds.

   j. If any organic HAP containing cleanup materials are employed, the individual organic HAP content of each cleanup material, in percent by weight of individual HAP.

   k. If any organic HAP containing cleanup materials are employed, the total combined organic HAP content of each cleanup material, in percent by weight of combined HAP [sum of all the individual organic HAP contents from (j)].

l. The total monthly emissions, in pounds, calculated as below:

Monthly VOC emissions =
sum of [(d) * 0.015 lb VOC emissions/lb VOC input] for all batches made per month + (i).

Monthly single HAP emissions for each HAP =
sum of [(e) * 0.015 lb HAP emissions/lb HAP] for all batches made per month + sum of [(g) * 0.001 lb HAP emissions/lb HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of (i * j) for all liquid organic cleanup materials used.

Monthly total HAP emissions =
sum of [(f) * 0.015 lb HAP emissions/lb HAP ] for all batches made + sum of [(h) * 0.001 lb HAP emissions/lb HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of all (i * k) for all liquid organic cleanup materials used.

m. The rolling, 12-month summation of VOC emissions, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined calculated as below:

Rolling, 12-month summation of VOC emissions = (monthly VOC emissions from (l) + sum of monthly VOC emissions from previous 11 calendar months)/2000.

2. The permittee shall maintain monthly records of the following:

a. The total monthly VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined, in tons.

b. The rolling, 12-month summation of the VOC input, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined calculated as below:

Rolling, 12-month summation of VOC input = (monthly VOC input from (a) + sum of monthly VOC input from previous 11 calendar months)

Also during the first 12 calendar months of operation following issuance of this permit, the permittee shall record the cumulative VOC input for each calendar month.

c. The monthly single HAP emissions from all facility emissions units combined, in pounds, for each single HAP.

d. The rolling, 12-month summation of single HAP emissions, in tons, from all facility

emission units combined calculated as below for each single HAP:

Rolling, 12-month summation of single HAP emissions = (monthly single HAP emissions from (c) + sum of monthly single HAP emissions from previous 11 calendar months)/2000.

e. The monthly total HAPs (sum of all single HAPs) emissions from all facility emissions units combined, in pounds.

f.. The rolling, 12-month summation of total HAPs (sum of all single HAPs) emissions, in tons, from all facility emissions units combined calculated as below:

Rolling, 12-month summation of total HAPs (sum of all single HAPs) emissions = (monthly total HAPs emissions from (e) + sum of monthly total HAPs emissions from previous 11 calendar months)/2000.

3. The permittee shall collect and record the following information for the purpose of determining annual VOC emissions:

a. The identification of each batch made (product code).

b. The batch size, in pounds.

c. The liquid volatile organic compound input for each batch, in pounds.

d. The liquid volatile organic compound cleanup material employed, in pounds.

e. The total VOC emissions from all batches produced and cleanup materials employed, in pounds or tons.

4. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.

## IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for VOC emissions and VOC input for emissions units

P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative VOC input levels.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month HAP emission limitations for the facility as set forth in term A.2.b. The permittee shall submit quarterly reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance.

3. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in term A.II.1.

4. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

5. The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

## V. Testing Requirements

1. The permittee may determine the VOC content of materials based on formulation data, and may rely on volatile matter content data provided by material suppliers. In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR Part 60, Subpart A, Test Methods 24 or 24A shall be used unless the permittee can demonstrate to the satisfaction of the agency that the formulation data is correct.

2. Emission limitation:
   Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a 6-minute average, except as specified by rule.

   Applicable Compliance Method:
   Compliance with the visible particulate emission limitation shall be demonstrated by the methods outlined in 40 CFR Part 60, Appendix A, Method 9.

3. Emission limitation:
   3.45 lbs. of VOC/hr

Applicable compliance method:
Compliance with the VOC emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.4-1 (5/83), Uncontrolled emission factors for paint and varnish manufacturing.

4. Emission limitation:
15.11 TPY VOC

Applicable Compliance Method:
Compliance shall be determined based on record keeping in Term A.III.3.

5. Emission limitation:
39.9 TPY VOC, based upon a rolling, 12-month summation from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined and 9.9 TPY for single HAP and 24.9 TPY for combined HAPs (sum of all single HAPs) from the facility.

Applicable Compliance Method:
Compliance shall be determined based on record keeping in Terms A.III.1 and A.III.2.

6. Emission limitation
0.01 lb PM /hr

Applicable compliance method:
Compliance with the particulate and PM-10 emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.7-1 (5/83), Emission factors for printing ink manufacturing, and a fabric filter control factor of 95 per cent control efficiency.

7. Emission limitation
0.05 TPY PM /PM10

Applicable compliance method:
Compliance with the particulate and PM-10 emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.7-1 (5/83), Emission factors for printing ink manufacturing, and a fabric filter control factor of 95 per cent control efficiency, multiplied by the sum of all pigment usage totals in A.III.c.

8. Compliance with the VOC input limit in term A.I.2.c shall be determined by the record keeping in term A.III

## VI. Miscellaneous Requirements

None

**State Only Enforceable Section**

## I. Applicable Emissions Limitations and/or Control Requirements

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

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| P481 - Ball Mill F fabric filter, equipment ID 34-21-101R | | |

**2. Additional Terms and Conditions**

**2.a** None

## II. Operational Restrictions

None

## III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

   The following summarizes the results of the modeling for the "worst case" pollutant(s):

   Pollutant: Xylene

TLV (ug/m3): 434,192

Maximum Hourly Emission Rate (lbs/hr): 36.1
(Emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507, combined)

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 6997

MAGLC (ug/m3): 10,338

Physical changes to or in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the " Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s)to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

a. A description of the parameters changed(composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. When the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

## IV. Reporting Requirements

None

## V. Testing Requirements

None

## VI. Miscellaneous Requirements

None

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

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

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

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | |
|---|---|---|
| P482 - Ball Mill G with baghouse, equipment ID 34-21-106R | OAC rule 3745-31-05(A)(3) | OAC rule 3745-17-07(A)(1) |
| | OAC rule 3745-31-05 (D) | |
| | OAC rule 3745-17-11(B)(1) | |

| Applicable Emissions Limitations/Control Measures | |
|---|---|
| Particulate Matter-particulate matter less than 10 microns (PM-PM10) emissions shall not exceed 0.01 pound (lb)/hour (hr*) and 0.05 TPY; volatile organic compound (VOC) emissions shall not exceed 1.73 lbs VOC/hr* and 7.56 TPY.<br><br>See term A.2.a.<br><br>*The hourly emissions limitation is based on the maximum capacity of the equipment and thus, no hourly record keeping is required.<br><br>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1), and 3745-31-05(D).<br><br>39.9 TPY VOC based on a rolling, 12-month summation.<br><br>See Terms A.2.b, and A.2.c<br><br>The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A)(3). | Visible particulate emissions from any stack exceed 20% opacity, as a six-minute average, except as specified by rule. |

**2. Additional Terms and Conditions**

**2.a** Compliance with OAC rule 3745-31-05(A)(3) (BAT) shall be demonstrated by the use of a baghouse for control of particulate emissions, use of covers for control of volatile organic compound emissions, VOC input limitations and compliance with the Ohio Air Toxics Policy.

**2.b** The total combined emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation and the permittee will use existing records along with records required in this permit to demonstrate compliance with this limit upon issuance of the permit.

**2.c** The total VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined shall not exceed 2660 tons per year based upon a rolling, 12-month summation of the VOC input.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the VOC input levels specified in the following table:

| Month(s) | Maximum Allowable VOC Input (Tons) |
|---|---|
| 1 | 444 |
| 1-2 | 888 |
| 1-3 | 1110 |
| 1-4 | 1332 |
| 1-5 | 1554 |
| 1-6 | 1776 |
| 1-7 | 1998 |
| 1-8 | 2220 |
| 1-9 | 2442 |
| 1-10 | 2660 |
| 1-11 | 2660 |
| 1-12 | 2660 |

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual VOC input limit shall be based upon a rolling, 12-month summation of the VOC input.

## II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range established either during the most recent emission test that demonstrated that the emissions unit was in compliance or by the manufacturer's written recommendation while the emissions unit is in operation.

## III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month:

   a. The identification of each batch made (product code).

   b. The batch size, in pounds.

   c. The total pigment content of each batch, in pounds.

   d. The liquid volatile organic compound input for each batch, in pounds.

   e. The individual organic HAP content of each batch, in pounds of individual HAP.

   f. The total combined organic HAP content of each batch, in pounds of combined HAP [sum of all the individual organic HAP contents from (e)].

   g. If any inorganic HAP materials are employed, the individual inorganic HAP content of each batch, in pounds of individual HAP.

   h. If any inorganic HAP materials are employed, the total combined inorganic HAP content of each batch, in pounds of combined HAP [sum of all the individual inorganic HAP contents from (g)].

   i. The liquid organic cleanup material employed, in pounds.

   j. If any organic HAP containing cleanup materials are employed, the individual organic HAP content of each cleanup material, in percent by weight of individual HAP.

   k. If any organic HAP containing cleanup materials are employed, the total combined organic

HAP content of each cleanup material, in percent by weight of combined HAP [sum of all the individual organic HAP contents from (j)].

l. The total monthly emissions, in pounds, calculated as below:

Monthly VOC emissions =
sum of [(d) * 0.015 lb VOC emissions/lb VOC input] for all batches made per month + (i).

Monthly single HAP emissions for each HAP =
sum of [(e) * 0.015 lb HAP emissions/lb HAP] for all batches made per month + sum of [(g) * 0.001 lb HAP emissions/lb HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of (i * j) for all liquid organic cleanup materials used.

Monthly total HAP emissions =
sum of [(f) * 0.015 lb HAP emissions/lb HAP ] for all batches made + sum of [(h) * 0.001 lb HAP emissions/lb HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of all (i * k) for all liquid organic cleanup materials used.

m. The rolling, 12-month summation of VOC emissions, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined calculated as below:

Rolling, 12-month summation of VOC emissions = (monthly VOC emissions from (l) + sum of monthly VOC emissions from previous 11 calendar months)/2000.

2. The permittee shall maintain monthly records of the following:

a. The total monthly VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined, in tons.

b. The rolling, 12-month summation of the VOC input, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined calculated as below:

Rolling, 12-month summation of VOC input = (monthly VOC input from (a) + sum of monthly VOC input from previous 11 calendar months)

Also during the first 12 calendar months of operation following issuance of this permit, the permittee shall record the cumulative VOC input for each calendar month.

c. The monthly single HAP emissions from all facility emissions units combined, in pounds, for each single HAP.

d. The rolling, 12-month summation of single HAP emissions, in tons, from all facility emission units combined calculated as below for each single HAP:

Rolling, 12-month summation of single HAP emissions = (monthly single HAP emissions from (c) + sum of monthly single HAP emissions from previous 11 calendar months)/2000.

e. The monthly total HAPs (sum of all single HAPs) emissions from all facility emissions units combined, in pounds.

f. The rolling, 12-month summation of total HAPs (sum of all single HAPs) emissions, in tons, from all facility emissions units combined calculated as below:

Rolling, 12-month summation of total HAPs (sum of all single HAPs) emissions = (monthly total HAPs emissions from (e) + sum of monthly total HAPs emissions from previous 11 calendar months)/2000.

3. The permittee shall collect and record the following information for the purpose of determining annual VOC emissions:

a. The identification of each batch made (product code).

b. The batch size, in pounds.

c. The liquid volatile organic compound input for each batch, in pounds.

d. The liquid volatile organic compound cleanup material employed, in pounds.

e. The total VOC emissions from all batches produced and cleanup materials employed, in pounds or tons.

4. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.

## IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the

rolling, 12-month emission limitation for VOC emissions and VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative VOC input levels.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month HAP emission limitations for the facility as set forth in term A.2.b. The permittee shall submit quarterly reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance.

3. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in term A.II.1.

4. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

5. The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

## V. Testing Requirements

1. The permittee may determine the VOC content of materials based on formulation data, and may rely on volatile matter content data provided by material suppliers. In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR Part 60, Subpart A, Test Methods 24 or 24A shall be used unless the permittee can demonstrate to the satisfaction of the agency that the formulation data is correct.

2. Emission limitation:
Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a 6-minute average, except as specified by rule.

Applicable Compliance Method:
Compliance with the visible particulate emission limitation shall be demonstrated by the methods outlined in 40 CFR Part 60, Appendix A, Method 9.

3. Emission limitation:
1.73 lbs. of VOC/hr

Applicable compliance method:
Compliance with the VOC emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.4-1 (5/83), Uncontrolled emission factors for paint and varnish manufacturing.

4. Emission limitation:
   7.56 TPY of VOC

   Applicable Compliance Method:
   Compliance shall be determined based on record keeping in Term A.III.3.

5. Emission limitation:
   39.9 TPY VOC, based upon a rolling, 12-month summation from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined and 9.9 TPY for single HAP and 24.9 TPY for combined HAPs (sum of all single HAPs) from the facility.

   Applicable Compliance Method:
   Compliance shall be determined based on record keeping in Terms A.III.1 and A.III.2.

6. Emission limitation
   0.01 lb PM /hr

   Applicable compliance method:
   Compliance with the particulate and PM-10 emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.7-1 (5/83), Emission factors for printing ink manufacturing, and a fabric filter control factor of 95 per cent control efficiency.

7. Emission limitation
   0.05 TPY PM /PM10

   Applicable compliance method:
   Compliance with the particulate and PM-10 emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.7-1 (5/83), Emission factors for printing ink manufacturing, multiplied by the sum of all pigment usage totals in term A.III.1.c, then multiplied by (1-.95)( fabric filter control efficiency).

8. Compliance with the VOC input limit in term A.I.2.c shall be determined by the record keeping in term A.III.2.

## VI. Miscellaneous Requirements

None

**B. State Only Enforceable Section**

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

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

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| P482 - Ball Mill G with baghouse, equipment ID 34-21-106R | | |

**2. Additional Terms and Conditions**

**2.a** None

**II. Operational Restrictions**

None

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

1. The permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

   The following summarizes the results of the modeling for the "worst case" pollutant(s):

   Pollutant: Xylene

   TLV (ug/m3): 434,192

   Maximum Hourly Emission Rate (lbs/hr): 36.1
   (Emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507, combined)

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 6997

MAGLC (ug/m3): 10,338

Physical changes to or in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the " Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s)to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

a. A description of the parameters changed(composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. When the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

## IV. Reporting Requirements

None

## V. Testing Requirements

None

## VI. Miscellaneous Requirements

None

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

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

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

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | |
|---|---|---|
| | | OAC rule 3745-17-11(B)(1) |
| P483 - Ball Mill L with baghouse, equipment ID 34-21-102R | OAC rule 3745-31-05 (A)(3) | |
| | | OAC rule 3745-17-07(A)(1) |
| | OAC rule 3745-31-05 (D) | |

| Applicable Emissions Limitations/Control Measures | |
|---|---|
| Particulate matter-particulate matter less than 10 microns (PM-PM10) emissions shall not exceed 0.01pound (lb)/hour (hr*) and 0.05 TPY PM-PM10; volatile organic matter (VOC) emissions shall not exceed 1.21 lbs VOC/hr* and 5.29 TPY.<br><br>See Term A.2.a<br><br>*The hourly emissions limitation is based on the maximum capacity of the equipment and thus, no hourly record keeping is required.<br><br>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1), and 3745-31-05(D).<br><br>VOC emissions shall not exceed 39.9 TPY based on a rolling, 12-month summation.<br><br>See Terms A.2.b and A.2.c<br><br>The emission limitation specified by this rule is less stringent than the emission | limitation established pursuant to OAC rule 3745-31-05 (A)(3).<br><br>Visible particulate emissions any stack shall not exceed 20% opacity, as a six- minute average, except as specified by rule. |

**2. Additional Terms and Conditions**

**2.a** Compliance with OAC rule 3745-31-05(A)(3) (BAT) shall be demonstrated by the use of a baghouse for control of particulate emissions, use of covers for control of volatile organic compound emissions, VOC input limitations and compliance with the Ohio Air Toxics Policy.

**2.b** The total combined emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation and the permittee will use existing records along with records required in this permit to demonstrate compliance with this limit upon issuance of the permit.

**2.c** The total VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined shall not exceed 2660 tons per year based upon a rolling, 12-month summation of the VOC input.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the VOC input levels specified in the following table:

| Month(s) | Maximum Allowable VOC Input (Tons) |
|---|---|
| 1 | 444 |
| 1-2 | 888 |
| 1-3 | 1110 |
| 1-4 | 1332 |
| 1-5 | 1554 |
| 1-6 | 1776 |
| 1-7 | 1998 |
| 1-8 | 2220 |
| 1-9 | 2442 |
| 1-10 | 2660 |
| 1-11 | 2660 |
| 1-12 | 2660 |

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual VOC input limit shall be based upon a rolling, 12-month summation of the VOC input.

## II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range established either during the most recent emission test that demonstrated that the emissions unit was in compliance or by the manufacturer's written recommendation while the emissions unit is in operation.

## III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month:

   a. The identification of each batch made (product code).

   b. The batch size, in pounds.

   c. The total pigment content of each batch, in pounds.

   d. The liquid volatile organic compound input for each batch, in pounds.

   e. The individual organic HAP content of each batch, in pounds of individual HAP.

   f. The total combined organic HAP content of each batch, in pounds of combined HAP [sum of all the individual organic HAP contents from (e)].

   g. If any inorganic HAP materials are employed, the individual inorganic HAP content of each batch, in pounds of individual HAP.

   h. If any inorganic HAP materials are employed, the total combined inorganic HAP content of each batch, in pounds of combined HAP [sum of all the individual inorganic HAP contents from (g)].

   i. The liquid organic cleanup material employed, in pounds.

   j. If any organic HAP containing cleanup materials are employed, the individual organic HAP content of each cleanup material, in percent by weight of individual HAP.

   k. If any organic HAP containing cleanup materials are employed, the total combined organic

HAP content of each cleanup material, in percent by weight of combined HAP [sum of all the individual organic HAP contents from (j)].

l. The total monthly emissions, in pounds, calculated as below:

Monthly VOC emissions =
sum of [(d) * 0.015 lb VOC emissions/lb VOC input] for all batches made per month + (i).

Monthly single HAP emissions for each HAP =
sum of [(e) * 0.015 lb HAP emissions/lb HAP] for all batches made per month + sum of [(g) * 0.001 lb HAP emissions/lb HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of (i * j) for all liquid organic cleanup materials used.

Monthly total HAP emissions =
sum of [(f) * 0.015 lb HAP emissions/lb HAP ] for all batches made + sum of [(h) * 0.001 lb HAP emissions/lb HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of all (i * k) for all liquid organic cleanup materials used.

m. The rolling, 12-month summation of VOC emissions, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined calculated as below:

Rolling, 12-month summation of VOC emissions = (monthly VOC emissions from (l) + sum of monthly VOC emissions from previous 11 calendar months)/2000.

2. The permittee shall maintain monthly records of the following:

a. The total monthly VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined, in tons.

b. The rolling, 12-month summation of the VOC input, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined calculated as below:

Rolling, 12-month summation of VOC input = (monthly VOC input from (a) + sum of monthly VOC input from previous 11 calendar months)

Also during the first 12 calendar months of operation following issuance of this permit, the

permittee shall record the cumulative VOC input for each calendar month.

c. The monthly single HAP emissions from all facility emissions units combined, in pounds, for each single HAP.

d. The rolling, 12-month summation of single HAP emissions, in tons, from all facility emission units combined calculated as below for each single HAP:

Rolling, 12-month summation of single HAP emissions = (monthly single HAP emissions from (c) + sum of monthly single HAP emissions from previous 11 calendar months)/2000.

e. The monthly total HAPs (sum of all single HAPs) emissions from all facility emissions units combined, in pounds.

f. The rolling, 12-month summation of total HAPs (sum of all single HAPs) emissions, in tons, from all facility emissions units combined calculated as below:

Rolling, 12-month summation of total HAPs (sum of all single HAPs) emissions = (monthly total HAPs emissions from (e) + sum of monthly total HAPs emissions from previous 11 calendar months)/2000.

3. The permittee shall collect and record the following information for the purpose of determining annual VOC emissions:

a. The identification of each batch made (product code).

b. The batch size, in pounds.

c. The liquid volatile organic compound input for each batch, in pounds.

d. The liquid volatile organic compound cleanup material employed, in pounds.

e. The total VOC emissions from all batches produced and cleanup materials employed, in pounds or tons.

4. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure

drop across the baghouse on a daily basis.

## IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for VOC emissions and VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative VOC input levels.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month HAP emission limitations for the facility as set forth in term A.2.b. The permittee shall submit quarterly reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance.

3. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in term A.II.1.

4. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

5. The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

## V. Testing Requirements

1. The permittee may determine the VOC content of materials based on formulation data, and may rely on volatile matter content data provided by material suppliers. In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR Part 60, Subpart A, Test Methods 24 or 24A shall be used unless the permittee can demonstrate to the satisfaction of the agency that the formulation data is correct.

2. Emission limitation:
   Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a 6-minute average, except as specified by rule.

   Applicable Compliance Method:
   Compliance with the visible particulate emission limitation shall be demonstrated by the methods outlined in 40 CFR Part 60, Appendix A, Method 9.

3. Emission limitation:
   1.21 lbs. VOC / hr

Applicable compliance method:
Compliance with the VOC emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.4-1 (5/83), Uncontrolled emission factors for paint and varnish manufacturing.

4. Emission limitation:
5.29 TPY VOC

Applicable Compliance Method:
Compliance shall be determined based on record keeping in Term A.III.3.

5. Emission limitation:
39.9 TPY VOC, based upon a rolling, 12-month summation from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined and 9.9 TPY for single HAP and 24.9 TPY for combined HAPs (sum of all single HAPs) from the facility.

Applicable Compliance Method:
Compliance shall be determined based on record keeping in Terms A.III.1 and A.III.2.

6. Emission limitation
0.01 lb of PM/PM-10 /hr

Applicable compliance method:
Compliance with the particulate and PM-10 emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.7-1 (5/83), Emission factors for printing ink manufacturing, and a fabric filter control factor of 95 per cent control efficiency.

7. Emission limitation
0.05 TPY of PM/PM10

Applicable compliance method:
Compliance with the particulate and PM-10 emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.7-1 (5/83), Emission factors for printing ink manufacturing, multiplied by the sum of all pigment usage totals in term A.III.1.c, then multiplied by (1-.95)( fabric filter control efficiency).

8. Compliance with the VOC input limit in term A.I.2.c shall be determined by the record keeping in term A.III.2.

## VI. Miscellaneous Requirements

None

**B. State Only Enforceable Section**

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

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

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| P483 - Ball Mill L with baghouse, equipment ID 34-21-102R | | |

**2. Additional Terms and Conditions**

**2.a** None

**II. Operational Restrictions**

None

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

1. The permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

   The following summarizes the results of the modeling for the "worst case" pollutant(s):

   Pollutant: Xylene

TLV (ug/m3): 434,192

Maximum Hourly Emission Rate (lbs/hr): 36.1
(Emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507, combined)

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 6997

MAGLC (ug/m3): 10,338

Physical changes to or in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the " Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s)to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.

Emissions Unit ID: P483

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

a. A description of the parameters changed(composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. When the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

## IV. Reporting Requirements

None

## V. Testing Requirements

None

## VI. Miscellaneous Requirements

None

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

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

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

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | |
|---|---|---|
| P484 - High Speed Disperser with baghouse 1, equipment ID 34-21-112M | OAC rule 3745-31-05 (A)(3) | OAC rule 3745-17-11(B)(1) |
| | | OAC rule 3745-17-07(A)(1) |
| | OAC rule 3745-31-05 (D) | |

| Applicable Emissions Limitations/Control Measures | | |
|---|---|---|
| Particulate matter-particulate matter less than 10 microns (PM-PM10) emissions shall not exceed 0.03 pound (lb)/hour (hr*) and 0.15 TPY PM-PM10; volatile organic compound (VOC) emissions shall not exceed 4.70 lb VOC/hr* and 20.56 TPY.<br><br>See Term A.2.a<br><br>*The hourly emissions limitation is based on the maximum capacity of the equipment and thus, no hourly record keeping is required.<br><br>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1), and 3745-31-05(D).<br><br>VOC emissions shall not exceed 39.9 TPY based on a rolling, 12-month summation.<br><br>See Terms A.2.b and A.2.c<br><br>The emission limitation | specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).<br><br>Visible particulate emissions from any stack shall not exceed 20% opacity, as a six- minute average, except as specified by rule. | |

**2. Additional Terms and Conditions**

**2.a** Compliance with OAC rule 3745-31-05(A)(3) (BAT) shall be demonstrated by the use of a baghouse for control of particulate emissions, use of covers for control of volatile organic compound emissions, VOC input limitations and compliance with the Ohio Air Toxics Policy.

**2.b** The total combined emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation and the permittee will use existing records along with records required in this permit to demonstrate compliance with this limit upon issuance of the permit.

**2.c** The total VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined shall not exceed 2660 tons per year based upon a rolling, 12-month summation of the VOC input.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the VOC input levels specified in the following table:

| Month(s) | Maximum Allowable VOC Input (Tons) |
|---|---|
| 1 | 444 |
| 1-2 | 888 |
| 1-3 | 1110 |
| 1-4 | 1332 |
| 1-5 | 1554 |
| 1-6 | 1776 |
| 1-7 | 1998 |
| 1-8 | 2220 |
| 1-9 | 2442 |
| 1-10 | 2660 |
| 1-11 | 2660 |
| 1-12 | 2660 |

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual VOC input limit shall be based upon a rolling, 12-month summation of the VOC input.

## II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range established either during the most recent emission test that demonstrated that the emissions unit was in compliance or by the manufacturer's written recommendation while the emissions unit is in operation.

2. The permittee shall not operate this emission unit without the use of a lid designed using good manufacturing practices to minimize emissions.

## III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month:

   a. The identification of each batch made (product code).

   b. The batch size, in pounds.

   c. The total pigment content of each batch, in pounds.

   d. The liquid volatile organic compound input for each batch, in pounds.

   e. The individual organic HAP content of each batch, in pounds of individual HAP.

   f. The total combined organic HAP content of each batch, in pounds of combined HAP [sum of all the individual organic HAP contents from (e)].

   g. If any inorganic HAP materials are employed, the individual inorganic HAP content of each batch, in pounds of individual HAP.

   h. If any inorganic HAP materials are employed, the total combined inorganic HAP content of each batch, in pounds of combined HAP [sum of all the individual inorganic HAP contents from (g)].

   i. The liquid organic cleanup material employed, in pounds.

   j. If any organic HAP containing cleanup materials are employed, the individual organic HAP content of each cleanup material, in percent by weight of individual HAP.

   k. If any organic HAP containing cleanup materials are employed, the total combined organic HAP content of each cleanup material, in percent by weight of combined HAP [sum of all the individual organic HAP contents from (j)].

l. The total monthly emissions, in pounds, calculated as below:

Monthly VOC emissions =
sum of [(d) * 0.015 lb VOC emissions/lb VOC input] for all batches made per month + (i).

Monthly single HAP emissions for each HAP =
sum of [(e) * 0.015 lb HAP emissions/lb HAP] for all batches made per month + sum of [(g) * 0.001 lb HAP emissions/lb HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of (i * j) for all liquid organic cleanup materials used.

Monthly total HAP emissions =
sum of [(f) * 0.015 lb HAP emissions/lb HAP ] for all batches made + sum of [(h) * 0.001 lb HAP emissions/lb HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of all (i * k) for all liquid organic cleanup materials used.

m. The rolling, 12-month summation of VOC emissions, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined calculated as below:

Rolling, 12-month summation of VOC emissions = (monthly VOC emissions from (l) + sum of monthly VOC emissions from previous 11 calendar months)/2000.

2. The permittee shall maintain monthly records of the following:

a. The total monthly VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined, in tons.

b. The rolling, 12-month summation of the VOC input, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined calculated as below:

Rolling, 12-month summation of VOC input = (monthly VOC input from (a) + sum of monthly VOC input from previous 11 calendar months)

Also during the first 12 calendar months of operation following issuance of this permit, the

permittee shall record the cumulative VOC input for each calendar month.

c. The monthly single HAP emissions from all facility emissions units combined, in pounds, for each single HAP.

d. The rolling, 12-month summation of single HAP emissions, in tons, from all facility emission units combined calculated as below for each single HAP:

Rolling, 12-month summation of single HAP emissions = (monthly single HAP emissions from (c) + sum of monthly single HAP emissions from previous 11 calendar months)/2000.

e. The monthly total HAPs (sum of all single HAPs) emissions from all facility emissions units combined, in pounds.

f. The rolling, 12-month summation of total HAPs (sum of all single HAPs) emissions, in tons, from all facility emissions units combined calculated as below:

Rolling, 12-month summation of total HAPs (sum of all single HAPs) emissions = (monthly total HAPs emissions from (e) + sum of monthly total HAPs emissions from previous 11 calendar months)/2000.

3. The permittee shall collect and record the following information for the purpose of determining annual VOC emissions:

a. The identification of each batch made (product code).

b. The batch size, in pounds.

c. The liquid volatile organic compound input for each batch, in pounds.

d. The liquid volatile organic compound cleanup material employed, in pounds.

e. The total VOC emissions from all batches produced and cleanup materials employed, in pounds or tons.

4. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.

5. The permittee shall maintain a record indicating that a cover designed using good engineering practices to minimize emissions is used whenever this emissions unit is in operation.

## IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for VOC emissions and VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative VOC input levels.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month HAP emission limitations for the facility as set forth in term A.2.b. The permittee shall submit quarterly reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance.

3. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in term A.II.1.

4. The permittee shall submit control measure deviation (excursion) reports that identify all periods of time when the emission unit was in operation without the use of a lid designed using good engineering practices to minimize emissions.

5. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

6. The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

## V. Testing Requirements

1. The permittee may determine the VOC content of materials based on formulation data, and may rely on volatile matter content data provided by material suppliers. In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR Part 60, Subpart A, Test Methods 24 or 24A shall be used unless the permittee can demonstrate to the satisfaction of the agency that the formulation data is correct.

2. Emission limitation:
   Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a 6-minute average, except as specified by rule.

   Applicable Compliance Method:

Compliance with the visible particulate emission limitation shall be demonstrated by the methods outlined in 40 CFR Part 60, Appendix A, Method 9.

3. Emission limitation:
4.70 lbs. of VOC/hr

Applicable compliance method:
Compliance with the VOC emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.4-1 (5/83), Uncontrolled emission factors for paint and varnish manufacturing.

4. Emission limitation:
20.56 TPY VOC

Applicable Compliance Method:
Compliance shall be determined based on record keeping in Term A.III.3.

5. Emission limitation:
39.9 TPY VOC, based upon a rolling, 12-month summation from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined and 9.9 TPY for single HAP and 24.9 TPY for combined HAPs (sum of all single HAPs) from the facility.

Applicable Compliance Method:
Compliance shall be determined based on record keeping in Terms A.III.1 and A.III.2.

6. Emission limitation
0.03 lb PM /hr

Applicable compliance method:
Compliance with the particulate and PM-10 emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.7-1 (5/83), Emission factors for printing ink manufacturing, and a fabric filter control factor of 95 per cent control efficiency.

7. Emission limitation
0.15 TPY PM /PM10

Applicable compliance method:
Compliance with the particulate and PM-10 emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.7-1 (5/83), Emission factors for printing ink manufacturing, multiplied by the sum of all pigment usage totals in term A.III.1.c, then multiplied by (1-.95)( fabric filter control efficiency).

8. Compliance with the VOC input limit in term A.I.2.c shall be determined by the record keeping in term A.III.2.

## VI. Miscellaneous Requirements

None

**B. State Only Enforceable Section**

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

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

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| P484 - High Speed Disperser 1, equipment ID 34-21-112M | | |

**2. Additional Terms and Conditions**

**2.a** None

**II. Operational Restrictions**

None

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

1. The permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

   The following summarizes the results of the modeling for the "worst case" pollutant(s):

   Pollutant: Xylene

TLV (ug/m3): 434,192

Maximum Hourly Emission Rate (lbs/hr): 36.1
(Emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507, combined)

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 6997

MAGLC (ug/m3): 10,338

Physical changes to or in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the " Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s)to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

a. A description of the parameters changed(composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. When the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

## IV. Reporting Requirements

None

## V. Testing Requirements

None

## VI. Miscellaneous Requirements

None

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

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

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

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | |
|---|---|---|
| P485 - High Speed Disperser 2, equipment ID 34-21-113M | OAC rule 3745-31-05 (A)(3) | OAC rule 3745-17-11(B)(1) |
| | | OAC rule 3745-17-07(A)(1) |
| | OAC rule 3745-31-05 (D) | |

| Applicable Emissions Limitations/Control Measures | |
|---|---|
| Particulate matter-particulate matter less than 10 microns (PM-PM10) emissions shall not exceed 0.03 pound (lb)/hour (hr*) and 0.15 ton per year (TPY); volatile organic compound (VOC) emissions shall not exceed 4.70 lb/hr* and 20.56 TPY.<br><br>See Term A.2.a<br><br>*The hourly emissions limitation is based on the maximum capacity of the equipment and thus, no hourly record keeping is required.<br><br>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-31-05(D).<br><br>VOC emissions shall not exceed 39.9 | TPY based on a rolling, 12-month summation.<br><br>See Terms A.2.b and A.2.c<br><br>The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).<br><br>Visible particulate emissions from any stack shall not exceed 20% opacity, as a six- minute average, except as specified by rule. |

**2. Additional Terms and Conditions**

**2.a** Compliance with OAC rule 3745-31-05(A)(3) (BAT) shall be demonstrated by the use of a baghouse for control of particulate emissions, use of covers for control of volatile organic compound emissions, VOC input limitations and compliance with the Ohio Air Toxics Policy.

**2.b** The total combined emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation and the permittee will use existing records along with records required in this permit to demonstrate compliance with this limit upon issuance of the permit.

**2.c** The total VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined shall not exceed 2660 tons per year based upon a rolling, 12-month summation of the VOC input.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the VOC input levels specified in the following table:

| Month(s) | Maximum Allowable VOC Input (Tons) |
|---|---|
| 1 | 444 |
| 1-2 | 888 |
| 1-3 | 1110 |
| 1-4 | 1332 |
| 1-5 | 1554 |
| 1-6 | 1776 |
| 1-7 | 1998 |
| 1-8 | 2220 |
| 1-9 | 2442 |
| 1-10 | 2660 |
| 1-11 | 2660 |
| 1-12 | 2660 |

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual VOC input limit shall be based upon a rolling, 12-month summation of the VOC input.

## II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range established either during the most recent emission test that demonstrated that the emissions unit was in compliance or by the manufacturer's written recommendation while the emissions unit is in operation.

2. The permittee shall not operate this emission unit without the use of a lid designed using good manufacturing practices to minimize emissions.

## III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month:

   a. The identification of each batch made (product code).

   b. The batch size, in pounds.

   c. The total pigment content of each batch, in pounds.

   d. The liquid volatile organic compound input for each batch, in pounds.

   e. The individual organic HAP content of each batch, in pounds of individual HAP.

   f. The total combined organic HAP content of each batch, in pounds of combined HAP [sum of all the individual organic HAP contents from (e)].

   g. If any inorganic HAP materials are employed, the individual inorganic HAP content of each batch, in pounds of individual HAP.

   h. If any inorganic HAP materials are employed, the total combined inorganic HAP content of each batch, in pounds of combined HAP [sum of all the individual inorganic HAP contents from (g)].

   i. The liquid organic cleanup material employed, in pounds.

   j. If any organic HAP containing cleanup materials are employed, the individual organic HAP content of each cleanup material, in percent by weight of individual HAP.

   k. If any organic HAP containing cleanup materials are employed, the total combined organic HAP content of each cleanup material, in percent by weight of combined HAP [sum of all the individual organic HAP contents from (j)].

l. The total monthly emissions, in pounds, calculated as below:

MonthlyVOC emissions =
sum of [(d) * 0.015 lb VOC emissions/lb VOC input] for all batches made per month + (i).

Monthly single HAP emissions for each HAP =
sum of [(e) * 0.015 lb HAP emissions/lb HAP] for all batches made per month + sum of [(g) * 0.001 lb HAP emissions/lb HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of (i * j) for all liquid organic cleanup materials used.

Monthly total HAP emissions =
sum of [(f) * 0.015 lb HAP emissions/lb HAP ] for all batches made + sum of [(h) * 0.001 lb HAP emissions/lb HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of all (i * k) for all liquid organic cleanup materials used.

m. The rolling, 12-month summation of VOC emissions, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined calculated as below:

Rolling, 12-month summation of VOC emissions = (monthly VOC emissions from (l) + sum of monthly VOC emissions from previous 11 calendar months)/2000.

2. The permittee shall maintain monthly records of the following:

a. The total monthly VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined, in tons.

b. The rolling, 12-month summation of the VOC input, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined calculated as below:

Rolling, 12-month summation of VOC input = (monthly VOC input from (a) + sum of monthly VOC input from previous 11 calendar months)

Also during the first 12 calendar months of operation following issuance of this permit, the permittee shall record the cumulative VOC input for each calendar month.

c. The monthly single HAP emissions from all facility emissions units combined, in pounds, for each single HAP.

d. The rolling, 12-month summation of single HAP emissions, in tons, from all facility

emission units combined calculated as below for each single HAP:

Rolling, 12-month summation of single HAP emissions = (monthly single HAP emissions from (c) + sum of monthly single HAP emissions from previous 11 calendar months)/2000.

e. The monthly total HAPs (sum of all single HAPs) emissions from all facility emissions units combined, in pounds.

f. The rolling, 12-month summation of total HAPs (sum of all single HAPs) emissions, in tons, from all facility emissions units combined calculated as below:

Rolling, 12-month summation of total HAPs (sum of all single HAPs) emissions = (monthly total HAPs emissions from (e) + sum of monthly total HAPs emissions from previous 11 calendar months)/2000.

3. The permittee shall collect and record the following information for the purpose of determining annual VOC emissions:

a. The identification of each batch made (product code).

b. The batch size, in pounds.

c. The liquid volatile organic compound input for each batch, in pounds.

d. The liquid volatile organic compound cleanup material employed, in pounds.

e. The total VOC emissions from all batches produced and cleanup materials employed, in pounds or tons.

4. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.

5. The permittee shall maintain a record indicating that a cover designed using good engineering practices to minimize emissions is used whenever this emissions unit is in operation.

## IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for VOC emissions and VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative VOC input levels.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month HAP emission limitations for the facility as set forth in term A.2.b. The permittee shall submit quarterly reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance.

3. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in term A.II.1.

4. The permittee shall submit control measure deviation (excursion) reports that identify all periods of time when the emission unit was in operation without the use of a lid designed using good engineering practices to minimize emissions.

5. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

6. The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

## V. Testing Requirements

1. The permittee may determine the VOC content of materials based on formulation data, and may rely on volatile matter content data provided by material suppliers. In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR Part 60, Subpart A, Test Methods 24 or 24A shall be used unless the permittee can demonstrate to the satisfaction of the agency that the formulation data is correct.

2. Emission limitation:
   Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a 6-minute average, except as specified by rule.

   Applicable Compliance Method:
   Compliance with the visible particulate emission limitation shall be demonstrated by the methods outlined in 40 CFR Part 60, Appendix A, Method 9.

3. Emission limitation:
   4.70 lbs. of VOC / hr

Applicable compliance method:
Compliance with the VOC emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.4-1 (5/83), Uncontrolled emission factors for paint and varnish manufacturing.

4. Emission limitation:
20.56 TPY of VOC

Applicable Compliance Method:
Compliance shall be determined based on record keeping in Term A.III.3.

5. Emission limitation:
39.9 TPY VOC, based upon a rolling, 12-month summation from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined and 9.9 TPY for single HAP and 24.9 TPY for combined HAPs (sum of all single HAPs) from the facility.

Applicable Compliance Method:
Compliance shall be determined based on record keeping in Terms A.III.1 and A.III.2.

6. Emission limitation
0.03 lb PM /hr

Applicable compliance method:
Compliance with the particulate and PM-10 emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.7-1 (5/83), Emission factors for printing ink manufacturing, and a fabric filter control factor of 95 per cent control efficiency.

7. Emission limitation
0.15 TPY of PM /PM10

Applicable compliance method:
Compliance with the particulate and PM-10 emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.7-1 (5/83), Emission factors for printing ink manufacturing, multiplied by the sum of all pigment usage totals in term A.III.1.c, then multiplied by (1-.95)( fabric filter control efficiency).

8. Compliance with the VOC input limit in term A.I.2.c shall be determined by the record keeping in term A.III.2.

## VI. Miscellaneous Requirements

None

**B. State Only Enforceable Section**

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

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

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| P485 - High Speed Disperser 2, equipment ID 34-21-113M | | |

**2. Additional Terms and Conditions**

**2.a** None

**II. Operational Restrictions**

None

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

1. The permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

   The following summarizes the results of the modeling for the "worst case" pollutant(s):

   Pollutant: Xylene

   TLV (ug/m3): 434,192

   Maximum Hourly Emission Rate (lbs/hr): 36.1
   (Emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507, combined)

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 6997

MAGLC (ug/m3): 10,338

Physical changes to or in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the " Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s)to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.

2. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

a. A description of the parameters changed(composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. When the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

## IV. Reporting Requirements

None

## V. Testing Requirements

None

## VI. Miscellaneous Requirements

None

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

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

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

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | |
|---|---|---|
| P486 - High Speed Disperser 3 with baghouse, equipment ID 34-21-114M | OAC rule 3745-31-05 (A)(3) | OAC rule 3745-17-11(B)(1) |
| | | OAC rule 3745-17-07(A)(1) |
| | OAC rule 3745-31-05 (D) | |

| Applicable Emissions Limitations/Control Measures | |
|---|---|
| Particulate matter-particulate matter less than 10 microns (PM-PM10) emissions shall not exceed 0.03 pound (lb)/hour (hr*) and 0.15 ton per year (TPY); volatile organic compound (VOC) emissions shall not exceed 4.70 lb VOC/hr* and 20.56 TPY.<br><br>See Term A.2.a<br><br>*The hourly emissions limitation is based on the maximum capacity of the equipment and thus, no hourly record keeping is required.<br><br>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-31-05(D).<br><br>VOC emissions shall not exceed 39.9 TPY based on a rolling, 12-month summation.<br><br>See Term A.2.b and A.2.c | The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).<br><br>Visible particulate emissions from any stack shall not exceed 20% opacity, as a six- minute average, except as specified by rule. |

**2. Additional Terms and Conditions**

**2.a** Compliance with OAC rule 3745-31-05(A)(3) (BAT) shall be demonstrated by the use of a baghouse for control of particulate emissions, use of covers for control of volatile organic compound emissions, VOC input limitations and compliance with the Ohio Air Toxics Policy.

**2.b** The total combined emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation and the permittee will use existing records along with records required in this permit to demonstrate compliance with this limit upon issuance of the permit.

**2.c** The total VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined shall not exceed 2660 tons per year based upon a rolling, 12-month summation of the VOC input.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the VOC input levels specified in the following table:

| Month(s) | Maximum Allowable VOC Input (Tons) |
|---|---|
| 1 | 444 |
| 1-2 | 888 |
| 1-3 | 1110 |
| 1-4 | 1332 |
| 1-5 | 1554 |
| 1-6 | 1776 |
| 1-7 | 1998 |
| 1-8 | 2220 |
| 1-9 | 2442 |
| 1-10 | 2660 |
| 1-11 | 2660 |
| 1-12 | 2660 |

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual VOC input limit shall be based upon a rolling, 12-month summation of the VOC input.

## II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range established either during the most recent emission test that demonstrated that the emissions unit was in compliance or by the manufacturer's written recommendation while the emissions unit is in operation.

2. The permittee shall not operate this emission unit without the use of a lid designed using good manufacturing practices to minimize emissions.

## III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month:

   a. The identification of each batch made (product code).

   b. The batch size, in pounds.

   c. The total pigment content of each batch, in pounds.

   d. The liquid volatile organic compound input for each batch, in pounds.

   e. The individual organic HAP content of each batch, in pounds of individual HAP.

   f. The total combined organic HAP content of each batch, in pounds of combined HAP [sum of all the individual organic HAP contents from (e)].

   g. If any inorganic HAP materials are employed, the individual inorganic HAP content of each batch, in pounds of individual HAP.

   h. If any inorganic HAP materials are employed, the total combined inorganic HAP content of each batch, in pounds of combined HAP [sum of all the individual inorganic HAP contents from (g)].

   i. The liquid organic cleanup material employed, in pounds.

   j. If any organic HAP containing cleanup materials are employed, the individual organic

HAP content of each cleanup material, in ~~pounds~~ percent by weight of individual HAP.

k. If any organic HAP containing cleanup materials are employed, the total combined organic HAP content of each cleanup material, in ~~pounds~~ percent by weight of combined HAP [sum of all the individual organic HAP contents from (j)].

l. The total monthly emissions, in pounds, calculated as below:

Monthly~~OC~~ VOC emissions =
sum of [(d) * 0.015 lb VOC emissions/lb VOC input] for all batches made per month + (i).

Monthly single HAP emissions for each HAP =
sum of [(e) * 0.015 lb HAP emissions/lb HAP] for all batches made per month + sum of [(g) * 0.001 lb HAP emissions/lb HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of (i * j) for all liquid organic cleanup materials used.

Monthly total HAP emissions =
sum of [(f) * 0.015 lb HAP emissions/lb HAP ] for all batches made + sum of [(h) * 0.001 lb HAP emissions/lb HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of all (i * k) for all liquid organic cleanup materials used.

m. The rolling, 12-month summation of VOC emissions, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined calculated as below:

Rolling, 12-month summation of VOC emissions = (monthly VOC emissions from (l) + sum of monthly VOC emissions from previous 11 calendar months)/2000.

2. The permittee shall maintain monthly records of the following:

a. The total monthly VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined, in tons.

b. The rolling, 12-month summation of the VOC input, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined calculated as below:

Rolling, 12-month summation of VOC input = (monthly VOC input from (a) + sum of monthly VOC input from previous 11 calendar months)

Also during the first 12 calendar months of operation following issuance of this permit, the

permittee shall record the cumulative VOC input for each calendar month.

c. The monthly single HAP emissions from all facility emissions units combined, in pounds, for each single HAP.

d. The rolling, 12-month summation of single HAP emissions, in tons, from all facility emission units combined calculated as below for each single HAP:

Rolling, 12-month summation of single HAP emissions = (monthly single HAP emissions from (c) + sum of monthly single HAP emissions from previous 11 calendar months)/2000.

e. The monthly total HAPs (sum of all single HAPs) emissions from all facility emissions units combined, in pounds.

f. The rolling, 12-month summation of total HAPs (sum of all single HAPs) emissions, in tons, from all facility emissions units combined calculated as below:

Rolling, 12-month summation of total HAPs (sum of all single HAPs) emissions = (monthly total HAPs emissions from (e) + sum of monthly total HAPs emissions from previous 11 calendar months)/2000.

3. The permittee shall collect and record the following information for the purpose of determining annual VOC emissions:

a. The identification of each batch made (product code).

b. The batch size, in pounds.

c. The liquid volatile organic compound input for each batch, in pounds.

d. The liquid volatile organic compound cleanup material employed, in pounds.

e. The total VOC emissions from all batches produced and cleanup materials employed, in pounds or tons.

4. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure

drop across the baghouse on a daily basis.

5. The permittee shall maintain a record indicating that a ~~tightly fitting~~ cover designed using good engineering **practices to minimize emissions** is used whenever this emissions unit is in operation.

## IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for VOC emissions and VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative VOC input levels.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month HAP emission limitations for the facility as set forth in term A.2.b. The permittee shall submit quarterly reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance.

3. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in term A.II.1.

4. The permittee shall submit control measure deviation (excursion) reports that identify all periods of time when the emission unit was in operation without the use of a ~~tightly fitting~~ lid designed using good engineering practices to minimize emissions.

5. The permittee shall submit annual reports which specify the total VOC ~~and PM-PM10~~ emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

6. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

## V. Testing Requirements

1. The permittee may determine the VOC content of materials based on formulation data, and may rely on volatile matter content data provided by material suppliers. In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR Part 60, Subpart A, Test Methods 24 or 24A shall be used unless the permittee can demonstrate to the satisfaction of the agency that the formulation data is correct.

2. Emission limitation:
   Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a 6-minute average, except as specified by rule.

Applicable Compliance Method:
Compliance with the visible particulate emission limitation shall be demonstrated by the methods outlined in 40 CFR Part 60, Appendix A, Method 9.

3. Emission limitation:
4.70 lbs. of VOC/hr

Applicable compliance method:
Compliance with the VOC emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.4-1 (5/83), Uncontrolled emission factors for paint and varnish manufacturing.

4. Emission limitation:
20.56 TPY of VOC

Applicable Compliance Method:
Compliance shall be determined based on record keeping in Term A.III.3.

5. Emission limitation:
39.9 TPY VOC, based upon a rolling, 12-month summation from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined and 9.9 TPY for single HAP and 24.9 TPY for combined HAPs (sum of all single HAPs) from the facility.

Applicable Compliance Method:
Compliance shall be determined based on record keeping in Terms A.III.1 and A.III.2.

6. Emission limitation
0.03 lb of PM-PM10/hr

Applicable compliance method:
Compliance with the particulate and PM-10 emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.7-1 (5/83), Emission factors for printing ink manufacturing, and a fabric filter control factor of 95 per cent control efficiency.

7. Emission limitation
0.15 TPY of PM/PM10

Applicable compliance method:
Compliance with the particulate and PM-10 emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.7-1 (5/83), Emission factors for printing ink manufacturing, multiplied by the sum of all pigment usage totals in term A.III.1.c. then multiplied by (1-.95)( fabric filter control efficiency).

8. Compliance with the VOC input limit in term A.I.2.c shall be determined by the record keeping in

term A.III.2.

## VI. Miscellaneous Requirements

None

**B. State Only Enforceable Section**

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

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

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| P486 - High Speed Disperser 3 with baghouse, equipment ~~ID 34-12-106M~~ ***ID 34-21-114M*** | | |

**2. Additional Terms and Conditions**

**2.a** None

**II. Operational Restrictions**

None

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

1. The permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

   The following summarizes the results of the modeling for the "worst case" pollutant(s):

   Pollutant: Xylene

TLV (ug/m3): 434,192

Maximum Hourly Emission Rate (lbs/hr): 36.1
(Emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507, combined)

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 6997

MAGLC (ug/m3): 10,338

Physical changes to or in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the " Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s)to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

a. A description of the parameters changed(composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. When the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

## IV. Reporting Requirements

None

## V. Testing Requirements

None

## VI. Miscellaneous Requirements

None

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

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

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

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | |
|---|---|---|
| P487 - High Speed Disperser 4 with baghouse, equipment ~~ID 34-12-105M~~ ***ID 34-21-115M*** | OAC rule 3745-31-05 (A)(3) | OAC rule 3745-17-11(B)(1) |
| | | OAC rule 3745-17-07(A)(1) |
| | OAC rule 3745-31-05 (D) | |

| Applicable Emissions Limitations/Control Measures | summation |
|---|---|
| Particulate matter-particulate matter less than 10 microns (PM-PM10) emissions shall not exceed 0.03/hour (hr*) and 0.15 ton per year (TPY); volatile organic compound (VOC) emissions shall not exceed 4.70 lb/hr* and 20.56 TPY.<br><br>See Term A.2.a<br><br>*The hourly emissions limitation is based on the maximum capacity of the equipment and thus, no hourly record keeping is required.<br><br>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-31-05(D).<br><br>VOC emissions shall not exceed 39.9 TPY based on a rolling, 12-month | See Terms A.2.b and A.2.c<br><br>The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).<br><br>Visible particulate emissions from any stack shall not exceed 20% opacity, as a six- minute average, except as specified by rule. |

**2. Additional Terms and Conditions**

**2.a** Compliance with OAC rule 3745-31-05(A)(3) (BAT) shall be demonstrated by the use of a baghouse for control of particulate emissions, use of covers for control of volatile organic compound emissions, VOC input limitations and compliance with the Ohio Air Toxics Policy.

**2.b** The total combined emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation and the permittee will use existing records along with records required in this permit to demonstrate compliance with this limit upon issuance of the permit.

**2.c** The total VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined shall not exceed 2660 tons per year based upon a rolling, 12-month summation of the VOC input.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the VOC input levels specified in the following table:

| Month(s) | Maximum Allowable VOC Input (Tons) |
|---|---|
| 1 | 444 |
| 1-2 | 888 |
| 1-3 | 1110 |
| 1-4 | 1332 |
| 1-5 | 1554 |
| 1-6 | 1776 |
| 1-7 | 1998 |
| 1-8 | 2220 |
| 1-9 | 2442 |
| 1-10 | 2660 |
| 1-11 | 2660 |
| 1-12 | 2660 |

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual VOC input limit shall be based upon a rolling, 12-month summation of the VOC input.

## II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range established either during the most recent emission test that demonstrated that the emissions unit was in compliance or by the manufacturer's written recommendation while the emissions unit is in operation.

2. The permittee shall not operate this emission unit without the use of a ~~tight fitting~~ lid designed using good manufacturing practices to minimize emissions.

## III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month:

   a. The identification of each batch made (product code).

   b. The batch size, in pounds.

   c. The total pigment content of each batch, in pounds.

   d. The liquid volatile organic compound input for each batch, in pounds.

   e. The individual organic HAP content of each batch, in pounds of individual HAP.

   f. The total combined organic HAP content of each batch, in pounds of combined HAP [sum of all the individual organic HAP contents from (e)].

   g. If any inorganic HAP materials are employed, the individual inorganic HAP content of each batch, in pounds of individual HAP.

   h. If any inorganic HAP materials are employed, the total combined inorganic HAP content of each batch, in pounds of combined HAP [sum of all the individual inorganic HAP contents from (g)].

   i. The liquid organic cleanup material employed, in pounds.

   j. If any organic HAP containing cleanup materials are employed, the individual organic HAP content of each cleanup material, in ~~pounds~~ percent by weight of individual HAP.

   k. If any organic HAP containing cleanup materials are employed, the total combined organic HAP content of each cleanup material, in ~~pounds~~ percent by weight of combined HAP [sum of all the individual organic HAP contents from (j)].

l. The total monthly emissions, in pounds, calculated as below:

Monthly~~OC~~ VOC emissions =
sum of [(d) * 0.015 lb VOC emissions/lb VOC input] for all batches made per month + (i).

Monthly single HAP emissions for each HAP =
sum of [(e) * 0.015 lb HAP emissions/lb HAP] for all batches made per month + sum of [(g) * 0.001 lb HAP emissions/lb HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of (i * j) for all liquid organic cleanup materials used.

Monthly total HAP emissions =
sum of [(f) * 0.015 lb HAP emissions/lb HAP ] for all batches made + sum of [(h) * 0.001 lb HAP emissions/lb HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of all (i * k) for all liquid organic cleanup materials used.

m. The rolling, 12-month summation of VOC emissions, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined calculated as below:

Rolling, 12-month summation of VOC emissions = (monthly VOC emissions from (l) + sum of monthly VOC emissions from previous 11 calendar months)/2000.

2. The permittee shall maintain monthly records of the following:

a. The total monthly VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined, in tons.

b. The rolling, 12-month summation of the VOC input, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined calculated as below:

Rolling, 12-month summation of VOC input = (monthly VOC input from (a) + sum of monthly VOC input from previous 11 calendar months)

Also during the first 12 calendar months of operation following issuance of this permit, the permittee shall record the cumulative VOC input for each calendar month.

c. The monthly single HAP emissions from all facility emissions units combined, in pounds, for each single HAP.

d. The rolling, 12-month summation of single HAP emissions, in tons, from all facility emission units combined calculated as below for each single HAP:

Rolling, 12-month summation of single HAP emissions = (monthly single HAP emissions from (c) + sum of monthly single HAP emissions from previous 11 calendar months)/2000.

e. The monthly total HAPs (sum of all single HAPs) emissions from all facility emissions units combined, in pounds.

f. The rolling, 12-month summation of total HAPs (sum of all single HAPs) emissions, in tons, from all facility emissions units combined calculated as below:

Rolling, 12-month summation of total HAPs (sum of all single HAPs) emissions = (monthly total HAPs emissions from (e) + sum of monthly total HAPs emissions from previous 11 calendar months)/2000.

3. The permittee shall collect and record the following information for the purpose of determining annual VOC emissions:

a. The identification of each batch made (product code).

b. The batch size, in pounds.

c. The liquid volatile organic compound input for each batch, in pounds.

d. The liquid volatile organic compound cleanup material employed, in pounds.

e. The total VOC emissions from all batches produced and cleanup materials employed, in pounds or tons.

4. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.

5. The permittee shall maintain a record indicating that a ~~tightly fitting~~ cover designed using good engineering **practices to minimize emissions** is used whenever this emissions unit is in operation.

## IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for VOC emissions and VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative VOC input levels.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month HAP emission limitations for the facility as set forth in term A.2.b. The permittee shall submit quarterly reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance.

3. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in term A.II.1.

4. The permittee shall submit control measure deviation (excursion) reports that identify all periods of time when the emission unit was in operation without the use of a ~~tightly fitting~~ lid designed using good engineering practices to minimize emissions.

5. The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

6. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

## V. Testing Requirements

1. The permittee may determine the VOC content of materials based on formulation data, and may rely on volatile matter content data provided by material suppliers. In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR Part 60, Subpart A, Test Methods 24 or 24A shall be used unless the permittee can demonstrate to the satisfaction of the agency that the formulation data is correct.

2. Emission limitation:
   Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a 6-minute average, except as specified by rule.

   Applicable Compliance Method:
   Compliance with the visible particulate emission limitation shall be demonstrated by the methods outlined in 40 CFR Part 60, Appendix A, Method 9.

3. Emission limitation:

4.70 lbs. of VOC/hr

Applicable compliance method:
Compliance with the VOC emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.4-1 (5/83), Uncontrolled emission factors for paint and varnish manufacturing.

4. Emission limitation:
20.56 TPY of VOC

Applicable Compliance Method:
Compliance shall be determined based on record keeping in Term A.III.3.

5. Emission limitation:
39.9 TPY VOC, based upon a rolling, 12-month summation from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined and 9.9 TPY for single HAP and 24.9 TPY for combined HAPs (sum of all single HAPs) from the facility.

Applicable Compliance Method:
Compliance shall be determined based on record keeping in Terms A.III.1 and A.III.2.

6. Emission limitation
0.03 lb of PM-PM10/hr

Applicable compliance method:
Compliance with the particulate and PM-10 emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.7-1 (5/83), Emission factors for printing ink manufacturing, and a fabric filter control factor of 95 per cent control efficiency.

7. Emission limitation
0.15 TPY of PM /PM10

Applicable compliance method:
Compliance with the particulate and PM-10 emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.7-1 (5/83), Emission factors for printing ink manufacturing, multiplied by the sum of all pigment usage totals in term A.III.1.c. then multiplied by (1-.95)( fabric filter control efficiency).

8. Compliance with the VOC input limit in term A.I.2.c shall be determined by the record keeping in term A.III.2.

## VI. Miscellaneous Requirements

None

**B. State Only Enforceable Section**

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

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

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| P487 - High Speed Disperser 4 with baghouse, equipment ~~ID 34-12-105M~~ ***ID 34-21-115M*** | | |

**2. Additional Terms and Conditions**

**2.a** None

**II. Operational Restrictions**

None

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

1. The permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

   The following summarizes the results of the modeling for the "worst case" pollutant(s):

   Pollutant: Xylene
   TLV (ug/m3): 434,192

   Maximum Hourly Emission Rate (lbs/hr): 36.1
   (Emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507, combined)

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 6997

MAGLC (ug/m3): 10,338

Physical changes to or in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the " Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s)to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

a. A description of the parameters changed(composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. When the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

## IV. Reporting Requirements

None

## V. Testing Requirements

None

## VI. Miscellaneous Requirements

None

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

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

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

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | |
|---|---|---|
| | | OAC rule 3745-17-08(B) |
| P488 - High Speed Disperser 5, equipment ID 34-12-103M | OAC rule 3745-31-05 (A)(3) | |
| | | OAC rule 3745-17-07(B)(1) |
| | OAC rule 3745-31-05 (D) | |

| Applicable Emissions Limitations/Control Measures | |
|---|---|
| Particulate matter-particulate matter less than 10 microns (PM-PM10) emissions shall not exceed 0.14 pound (lb)/hour (hr*) and 0.60 ton per year (TPY); volatile organic compound (VOC) emissions shall not exceed 4.70 lb/hr* and 20.56 TPY VOC.<br><br>See Term A.2.a<br><br>*The hourly emissions limitation is based on the maximum capacity of the equipment and thus, no hourly record keeping is required.<br><br>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(B)(1), 3745-17-08(B), and 3745-31-05(D).<br><br>VOC emissions shall not exceed 39.9 TPY based on a rolling, 12-month summation.<br><br>See Terms A.2.b and A.2.c | The permittee shall unload all solid materials in a manner to minimize or eliminate visible particulate emissions.<br><br>Visible particulate emissions shall not exceed 20% opacity, as a three-minute average, except as specified by rule. |

**2. Additional Terms and Conditions**

**2.a** Compliance with OAC rule 3745-31-05(A)(3) (BAT) shall be demonstrated by the use of a building enclosure for control of particulate emissions, use of covers for control of volatile organic compound emissions, VOC input limitations and compliance with the Ohio Air Toxics Policy.

**2.b** The total combined emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation and the permittee will use existing records along with records required in this permit to demonstrate compliance with this limit upon issuance of the permit.

**2.c** The total VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined shall not exceed 2660 tons per year based upon a rolling, 12-month summation of the VOC input.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the VOC input levels specified in the following table:

| Month(s) | Maximum Allowable VOC Input (Tons) |
|---|---|
| 1 | 444 |
| 1-2 | 888 |
| 1-3 | 1110 |
| 1-4 | 1332 |
| 1-5 | 1554 |
| 1-6 | 1776 |
| 1-7 | 1998 |
| 1-8 | 2220 |
| 1-9 | 2442 |
| 1-10 | 2660 |
| 1-11 | 2660 |
| 1-12 | 2660 |

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual VOC input limit shall be based upon a rolling, 12-month summation of the VOC input.

## II. Operational Restrictions

1. The permittee shall not operate this emission unit without the use of a ~~tight fitting~~ lid designed using good manufacturing practices to minimize emissions.

## III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month:

   a. The identification of each batch made (product code).

   b. The batch size, in pounds.

   c. The total pigment content of each batch, in pounds.

   d. The liquid volatile organic compound input for each batch, in pounds.

   e. The individual organic HAP content of each batch, in pounds of individual HAP.

   f. The total combined organic HAP content of each batch, in pounds of combined HAP [sum of all the individual organic HAP contents from (e)].

   g. If any inorganic HAP materials are employed, the individual inorganic HAP content of each batch, in pounds of individual HAP.

   h. If any inorganic HAP materials are employed, the total combined inorganic HAP content of each batch, in pounds of combined HAP [sum of all the individual inorganic HAP contents from (g)].

   i. The liquid organic cleanup material employed, in pounds.

   j. If any organic HAP containing cleanup materials are employed, the individual organic HAP content of each cleanup material, in ~~pounds~~ percent by weight of individual HAP.

   k. If any organic HAP containing cleanup materials are employed, the total combined organic HAP content of each cleanup material, in ~~pounds~~ percent by weight of combined HAP

[sum of all the individual organic HAP contents from (j)].

l. The total monthly emissions, in pounds, calculated as below:

Monthly~~OC~~ VOC emissions =
sum of [(d) * 0.015 lb VOC emissions/lb VOC input] for all batches made per month + (i).

Monthly single HAP emissions for each HAP =
sum of [(e) * 0.015 lb HAP emissions/lb HAP] for all batches made per month + sum of [(g) * 0.001 lb HAP emissions/lb HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of (i * j) for all liquid organic cleanup materials used.

Monthly total HAP emissions =
sum of [(f) * 0.015 lb HAP emissions/lb HAP ] for all batches made + sum of [(h) * 0.001 lb HAP emissions/lb HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of all (i * k) for all liquid organic cleanup materials used.

m. The rolling, 12-month summation of VOC emissions, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined calculated as below:

Rolling, 12-month summation of VOC emissions = (monthly VOC emissions from (l) + sum of monthly VOC emissions from previous 11 calendar months)/2000.

2. The permittee shall maintain monthly records of the following:

a. The total monthly VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined, in tons.

b. The rolling, 12-month summation of the VOC input, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined calculated as below:

Rolling, 12-month summation of VOC input = (monthly VOC input from (a) + sum of monthly VOC input from previous 11 calendar months)

Also during the first 12 calendar months of operation following issuance of this permit, the permittee shall record the cumulative VOC input for each calendar month.

c. The monthly single HAP emissions from all facility emissions units combined, in pounds, for each single HAP.

d The rolling, 12-month summation of single HAP emissions, in tons, from all facility emission units combined calculated as below for each single HAP:

Rolling, 12-month summation of single HAP emissions = (monthly single HAP emissions from (c) + sum of monthly single HAP emissions from previous 11 calendar months)/2000.

e. The monthly total HAPs (sum of all single HAPs) emissions from all facility emissions units combined, in pounds.

f. The rolling, 12-month summation of total HAPs (sum of all single HAPs) emissions, in tons, from all facility emissions units combined calculated as below:

Rolling, 12-month summation of total HAPs (sum of all single HAPs) emissions = (monthly total HAPs emissions from (e) + sum of monthly total HAPs emissions from previous 11 calendar months)/2000.

3. The permittee shall collect and record the following information for the purpose of determining annual VOC emissions:

a. The identification of each batch made (product code).

b. The batch size, in pounds.

c. The liquid volatile organic compound input for each batch, in pounds.

d. The liquid volatile organic compound cleanup material employed, in pounds.

e. The total VOC emissions from all batches produced and cleanup materials employed, in pounds or tons.

4. The permittee shall maintain a record indicating that a ~~tightly fitting~~ cover designed using good engineering **practices to minimize emissions** is used whenever this emissions unit is in operation.

## IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for VOC emissions and VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505,

P506 and P507 combined and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative VOC input levels.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month HAP emission limitations for the facility as set forth in term A.2.b. The permittee shall submit quarterly reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance.

3. The permittee shall submit control measure deviation (excursion) reports that identify all periods of time when the emission unit was in operation without the use of a ~~tightly fitting~~ lid designed using good engineering practices to minimize emissions.

4. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

5. The permittee shall submit annual reports which specify the total VOC ~~and PM-PM10~~ emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

## V. Testing Requirements

1. The permittee may determine the VOC content of materials based on formulation data, and may rely on volatile matter content data provided by material suppliers. In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR Part 60, Subpart A, Test Methods 24 or 24A shall be used unless the permittee can demonstrate to the satisfaction of the agency that the formulation data is correct.

2. Emission limitation:
Visible particulate emissions shall not exceed 20 percent opacity, as a 3-minute average, except as specified by rule.

Applicable Compliance Method:
Compliance with the visible particulate emission limitation shall be demonstrated by the methods outlined in 40 CFR Part 60, Appendix A, Method 9.

3. Emission limitation:
4.70 lbs. of VOC/hr

Applicable compliance method:
Compliance with the VOC emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.4-1 (5/83), Uncontrolled emission factors for paint and varnish manufacturing.

4. Emission limitation:
20.56 TPY of VOC

Applicable Compliance Method:
Compliance shall be determined based on record keeping in Term A.III.3.

5. Emission limitation:
39.9 TPY VOC, based upon a rolling, 12-month summation from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined and 9.9 TPY for single HAP and 24.9 TPY for combined HAPs (sum of all single HAPs) from the facility.

Applicable Compliance Method:
Compliance shall be determined based on record keeping in Terms A.III.1 and A.III.2.

6. Emission limitation
0.14 lb of PM-PM10/hr

Applicable compliance method:
Compliance with the particulate and PM-10 emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.7-1 (5/83), Emission factors for printing ink manufacturing.

7. Emission limitation
0.60 TPY of PM /PM10

Applicable compliance method:
Compliance with the particulate and PM-10 emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.7-1 (5/83), Emission factors for printing ink manufacturing, multiplied by the sum of all pigment usage totals in term A.III.1.c.

8. Compliance with the VOC input limit in term A.I.2.c shall be determined by the record keeping in term A.III.2.

## VI. Miscellaneous Requirements

None

**B. State Only Enforceable Section**

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

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

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| P488 - High Speed Disperser 5, equipment ID 34-12-103M | | |

**2. Additional Terms and Conditions**

**2.a** None

**II. Operational Restrictions**

None

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

1. The permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

   The following summarizes the results of the modeling for the "worst case" pollutant(s):

   Pollutant: Xylene

   TLV (ug/m3): 434,192

   Maximum Hourly Emission Rate (lbs/hr): 36.1
   (Emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507, combined)

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 6997

MAGLC (ug/m3): 10,338

Physical changes to or in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the " Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s)to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

a. A description of the parameters changed(composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. When the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

## IV. Reporting Requirements

None

## V. Testing Requirements

None

## VI. Miscellaneous Requirements

None

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

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

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

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | |
|---|---|---|
| | | OAC rule 3745-17-08(B) |
| P489 - High Speed Disperser 6, equipment ID 34-12-104M | OAC rule 3745-31-05 (A)(3) | |
| | | OAC rule 3745-17-07(B)(1) |
| | OAC rule 3745-31-05 (D) | |

| Applicable Emissions Limitations/Control Measures | |
|---|---|
| Particulate matter-particulate matter less than 10 microns (PM-PM10) emissions shall not exceed 0.14 pound (lb) /hour (hr*) and 0.60 ton per year (TPY); volatile organic compound (VOC) emissions shall not exceed 4.70 lb/ hr* and 20.6 TPY.<br><br>See Term A.2.a<br><br>*The hourly emissions limitation is based on the maximum capacity of the equipment and thus, no hourly record keeping is required.<br><br>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(B)(1), 3745-17-08(B), and 3745-31-05(D).<br><br>VOC emissions shall not exceed 39.9 TPY based on a rolling, 12-month summation. | See Terms A.2.b and A.2.c<br><br>The permittee shall unload all solid materials in a manner to minimize or eliminate visible particulate emissions.<br><br>Visible particulate emissions shall not exceed 20% opacity, as a three- minute average, except as specified by rule. |

**2. Additional Terms and Conditions**

**2.a** Compliance with OAC rule 3745-31-05(A)(3) (BAT) shall be demonstrated by the use of a building enclosure for control of particulate emissions, use of covers for control of volatile organic compound emissions, VOC input limitations and compliance with the Ohio Air Toxics Policy.

**2.b** The total combined emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation and the permittee will use existing records along with records required in this permit to demonstrate compliance with this limit upon issuance of the permit.

**2.c** The total VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined shall not exceed 2660 tons per year based upon a rolling, 12-month summation of the VOC input.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the VOC input levels specified in the following table:

| Month(s) | Maximum Allowable VOC Input (Tons) |
|---|---|
| 1 | 444 |
| 1-2 | 888 |
| 1-3 | 1110 |
| 1-4 | 1332 |
| 1-5 | 1554 |
| 1-6 | 1776 |
| 1-7 | 1998 |
| 1-8 | 2220 |
| 1-9 | 2442 |
| 1-10 | 2660 |
| 1-11 | 2660 |
| 1-12 | 2660 |

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual VOC input limit shall be based upon a rolling, 12-month summation of the VOC input.

## II. Operational Restrictions

1. The permittee shall not operate this emission unit without the use of a ~~tight fitting~~ lid designed using good manufacturing practices to minimize emissions.

## III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month:

   a. The identification of each batch made (product code).

   b. The batch size, in pounds.

   c. The total pigment content of each batch, in pounds.

   d. The liquid volatile organic compound input for each batch, in pounds.

   e. The individual organic HAP content of each batch, in pounds of individual HAP.

   f. The total combined organic HAP content of each batch, in pounds of combined HAP [sum of all the individual organic HAP contents from (e)].

   g. If any inorganic HAP materials are employed, the individual inorganic HAP content of each batch, in pounds of individual HAP.

   h. If any inorganic HAP materials are employed, the total combined inorganic HAP content of each batch, in pounds of combined HAP [sum of all the individual inorganic HAP contents from (g)].

   i. The liquid organic cleanup material employed, in pounds.

   j. If any organic HAP containing cleanup materials are employed, the individual organic HAP content of each cleanup material, in ~~pounds~~ percent by weight of individual HAP.

   k. If any organic HAP containing cleanup materials are employed, the total combined organic HAP content of each cleanup material, in ~~pounds~~ percent by weight of combined HAP [sum of all the individual organic HAP contents from (j)].

   l. The total monthly emissions, in pounds, calculated as below:

   Monthly~~OC~~ VOC emissions =
   sum of [(d) * 0.015 lb VOC emissions/lb VOC input] for all batches made per month +

(i).

Monthly single HAP emissions for each HAP =
sum of [(e) * 0.015 lb HAP emissions/lb HAP] for all batches made per month + sum of [(g) * 0.001 lb HAP emissions/lb HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of (i * j) for all liquid organic cleanup materials used.

Monthly total HAP emissions =
sum of [(f) * 0.015 lb HAP emissions/lb HAP ] for all batches made + sum of [(h) * 0.001 lb HAP emissions/lb HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of all (i * k) for all liquid organic cleanup materials used.

m. The rolling, 12-month summation of VOC emissions, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined calculated as below:

Rolling, 12-month summation of VOC emissions = (monthly VOC emissions from (l) + sum of monthly VOC emissions from previous 11 calendar months)/2000.

2. The permittee shall maintain monthly records of the following:

a. The total monthly VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined, in tons.

b. The rolling, 12-month summation of the VOC input, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined calculated as below:

Rolling, 12-month summation of VOC input = (monthly VOC input from (a) + sum of monthly VOC input from previous 11 calendar months)

Also during the first 12 calendar months of operation following issuance of this permit, the permittee shall record the cumulative VOC input for each calendar month.

c. The monthly single HAP emissions from all facility emissions units combined, in pounds, for each single HAP.

d. The rolling, 12-month summation of single HAP emissions, in tons, from all facility emission units combined calculated as below for each single HAP:

Rolling, 12-month summation of single HAP emissions = (monthly single HAP emissions from (c) + sum of monthly single HAP emissions from previous 11 calendar months)/2000.

e. The monthly total HAPs (sum of all single HAPs) emissions from all facility emissions units combined, in pounds.

f. The rolling, 12-month summation of total HAPs (sum of all single HAPs) emissions, in tons, from all facility emissions units combined calculated as below:

Rolling, 12-month summation of total HAPs (sum of all single HAPs) emissions = (monthly total HAPs emissions from (e) + sum of monthly total HAPs emissions from previous 11 calendar months)/2000.

3. The permittee shall collect and record the following information for the purpose of determining annual VOC emissions:

a. The identification of each batch made (product code).

b. The batch size, in pounds.

c. The liquid volatile organic compound input for each batch, in pounds.

d. The liquid volatile organic compound cleanup material employed, in pounds.

e. The total VOC emissions from all batches produced and cleanup materials employed, in pounds or tons.

4. The permittee shall maintain a record indicating that a ~~tightly fitting~~ cover designed using good engineering **practices to minimize emissions** is used whenever this emissions unit is in operation.

## IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for VOC emissions and VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative VOC input levels.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month HAP emission limitations for the facility as set forth in term A.2.b. The

permittee shall submit quarterly reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance.

3. The permittee shall submit control measure deviation (excursion) reports that identify all periods of time when the emission unit was in operation without the use of a ~~tightly fitting~~ lid designed using good engineering practices to minimize emissions.

4. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

5. The permittee shall submit annual reports which specify the total VOC ~~and PM-PM10~~ emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

## V. Testing Requirements

1. The permittee may determine the VOC content of materials based on formulation data, and may rely on volatile matter content data provided by material suppliers. In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR Part 60, Subpart A, Test Methods 24 or 24A shall be used unless the permittee can demonstrate to the satisfaction of the agency that the formulation data is correct.

2. Emission limitation:
   Visible particulate emissions shall not exceed 20 percent opacity, as a 3-minute average, except as specified by rule.

   Applicable Compliance Method:
   Compliance with the visible particulate emission limitation shall be demonstrated by the methods outlined in 40 CFR Part 60, Appendix A, Method 9.

3. Emission limitation:
   4.70 lbs. of VOC/hr

   Applicable compliance method:
   Compliance with the VOC emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.4-1 (5/83), Uncontrolled emission factors for paint and varnish manufacturing.

4. Emission limitation:
   20.56 TPY of VOC

Applicable Compliance Method:
Compliance shall be determined based on record keeping in Term A.III.3.

5. Emission limitation:
39.9 TPY VOC, based upon a rolling, 12-month summation from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined and 9.9 TPY for single HAP and 24.9 TPY for combined HAPs (sum of all single HAPs) from the facility.

Applicable Compliance Method:
Compliance shall be determined based on record keeping in Terms A.III.1 and A.III.2.

6. Emission limitation
0.14 lb of PM-PM10/hr

Applicable compliance method:
Compliance with the particulate and PM-10 emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.7-1 (5/83), Emission factors for printing ink manufacturing.

7. Emission limitation
0.60 TPY PM /PM10

Applicable compliance method:
Compliance with the particulate and PM-10 emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.7-1 (5/83), Emission factors for printing ink manufacturing, multiplied by the sum of all pigment usage totals in term A.III.1.c.

8. Compliance with the VOC input limit in term A.I.2.c shall be determined by the record keeping in term A.III.2.

## VI. Miscellaneous Requirements

None

**B. State Only Enforceable Section**

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

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

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| P489 - High Speed Disperser 6, equipment ID 34-12-104M | | |

**2. Additional Terms and Conditions**

**2.a** None

**II. Operational Restrictions**

None

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

1. The permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

   The following summarizes the results of the modeling for the "worst case" pollutant(s):

   Pollutant: Xylene

TLV (ug/m3): 434,192

Maximum Hourly Emission Rate (lbs/hr): 36.1
(Emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507, combined)

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 6997

MAGLC (ug/m3): 10,338

Physical changes to or in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the " Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s)to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic

Policy:"

a. A description of the parameters changed(composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. When the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

## IV. Reporting Requirements

None

## V. Testing Requirements

None

## VI. Miscellaneous Requirements

None

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

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

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

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | |
|---|---|---|
| | | OAC rule 3745-17-08(B) |
| P490 - High Speed Disperser 7, equipment ~~ID 34-21-103M~~ ***ID 34-12-105M*** | OAC rule 3745-31-05 (A)(3) | |
| | | OAC rule 3745-17-07(B)(1) |
| | OAC rule 3745-31-05 (D) | |

| Applicable Emissions Limitations/Control Measures | |
|---|---|
| Particulate matter-particulate matter emissions less than 10 microns (PM-PM10) shall not exceed 0.14 pound (lb)/hour (hr*) and 0.60 ton per year (TPY); volatile organic compound (VOC) emissions shall not exceed 4.70 lb VOC/hr* and 20.6 TPY.<br><br>See Term A.2.a<br><br>*The hourly emissions limitation is based on the maximum capacity of the equipment and thus, no hourly record keeping is required.<br><br>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(B)(1),3745-17-08(B), and 3745-31-05(D).<br><br>VOC emissions shall not exceed 39.9 TPY based on a rolling, 12-month summation. | See Terms A.2.b and A.2.c<br><br>The permittee shall unload all solid materials in a manner to minimize or eliminate visible particulate emissions.<br><br>Visible particulate emissions shall not exceed 20% opacity, as a three- minute average, except as specified by rule. |

**2. Additional Terms and Conditions**

**2.a** Compliance with OAC rule 3745-31-05(A)(3) (BAT) shall be demonstrated by the use of a building enclosure for control of particulate emissions, use of covers for control of volatile organic compound emissions, VOC input limitations and compliance with the Ohio Air Toxics Policy.

**2.b** The total combined emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation and the permittee will use existing records along with records required in this permit to demonstrate compliance with this limit upon issuance of the permit.

**2.c** The total VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined shall not exceed 2660 tons per year based upon a rolling, 12-month summation of the VOC input.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the VOC input levels specified in the following table:

| Month(s) | Maximum Allowable VOC Input (Tons) |
|---|---|
| 1 | 444 |
| 1-2 | 888 |
| 1-3 | 1110 |
| 1-4 | 1332 |
| 1-5 | 1554 |
| 1-6 | 1776 |
| 1-7 | 1998 |
| 1-8 | 2220 |
| 1-9 | 2442 |
| 1-10 | 2660 |
| 1-11 | 2660 |
| 1-12 | 2660 |

After the first 12 calendar months of operation following the issuance of this permit,

compliance with the annual VOC input limit shall be based upon a rolling, 12-month summation of the VOC input.

## II. Operational Restrictions

1. The permittee shall not operate this emission unit without the use of a ~~tight fitting~~ lid designed using good manufacturing practices to minimize emissions.

## III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month:

   a. The identification of each batch made (product code).

   b. The batch size, in pounds.

   c. The total pigment content of each batch, in pounds.

   d. The liquid volatile organic compound input for each batch, in pounds.

   e. The individual organic HAP content of each batch, in pounds of individual HAP.

   f. The total combined organic HAP content of each batch, in pounds of combined HAP [sum of all the individual organic HAP contents from (e)].

   g. If any inorganic HAP materials are employed, the individual inorganic HAP content of each batch, in pounds of individual HAP.

   h. If any inorganic HAP materials are employed, the total combined inorganic HAP content of each batch, in pounds of combined HAP [sum of all the individual inorganic HAP contents from (g)].

   i. The liquid organic cleanup material employed, in pounds.

   j. If any organic HAP containing cleanup materials are employed, the individual organic HAP content of each cleanup material, in ~~pounds~~ percent by weight of individual HAP.

   k. If any organic HAP containing cleanup materials are employed, the total combined organic HAP content of each cleanup material, in ~~pounds~~ percent by weight of combined HAP [sum of all the individual organic HAP contents from (j)].

   l. The total monthly emissions, in pounds, calculated as below:

      Monthly~~OC~~ VOC emissions =
      sum of [(d) * 0.015 lb VOC emissions/lb VOC input] for all batches made per month + (i).

Monthly single HAP emissions for each HAP =
sum of [(e) * 0.015 lb HAP emissions/lb HAP] for all batches made per month + sum of [(g) * 0.001 lb HAP emissions/lb HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of (i * j) for all liquid organic cleanup materials used.

Monthly total HAP emissions =
sum of [(f) * 0.015 lb HAP emissions/lb HAP ] for all batches made + sum of [(h) * 0.001 lb HAP emissions/lb HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of all (i * k) for all liquid organic cleanup materials used.

m. The rolling, 12-month summation of VOC emissions, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined calculated as below:

Rolling, 12-month summation of VOC emissions = (monthly VOC emissions from (l) + sum of monthly VOC emissions from previous 11 calendar months)/2000.

2. The permittee shall maintain monthly records of the following:

a. The total monthly VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined, in tons.

b. The rolling, 12-month summation of the VOC input, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined calculated as below:

Rolling, 12-month summation of VOC input = (monthly VOC input from (a) + sum of monthly VOC input from previous 11 calendar months)

Also during the first 12 calendar months of operation following issuance of this permit, the permittee shall record the cumulative VOC input for each calendar month.

c. The monthly single HAP emissions from all facility emissions units combined, in pounds, for each single HAP.

d. The rolling, 12-month summation of single HAP emissions, in tons, from all facility

emission units combined calculated as below for each single HAP:

Rolling, 12-month summation of single HAP emissions = (monthly single HAP emissions from (c) + sum of monthly single HAP emissions from previous 11 calendar months)/2000.

e. The monthly total HAPs (sum of all single HAPs) emissions from all facility emissions units combined, in pounds.

f. The rolling, 12-month summation of total HAPs (sum of all single HAPs) emissions, in tons, from all facility emissions units combined calculated as below:

Rolling, 12-month summation of total HAPs (sum of all single HAPs) emissions = (monthly total HAPs emissions from (e) + sum of monthly total HAPs emissions from previous 11 calendar months)/2000.

3. The permittee shall collect and record the following information for the purpose of determining annual VOC emissions:

a. The identification of each batch made (product code).

b. The batch size, in pounds.

c. The liquid volatile organic compound input for each batch, in pounds.

d. The liquid volatile organic compound cleanup material employed, in pounds.

e. The total VOC emissions from all batches produced and cleanup materials employed, in pounds or tons.

4. The permittee shall maintain a record indicating that a ~~tightly fitting~~ cover designed using good engineering **practices to minimize emissions** is used whenever this emissions unit is in operation.

## IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for VOC emissions and VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative VOC input levels.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month HAP emission limitations for the facility as set forth in term A.2.b. The permittee shall submit quarterly reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance.

3. The permittee shall submit control measure deviation (excursion) reports that identify all periods of time when the emission unit was in operation without the use of a ~~tightly fitting~~ lid designed using good engineering practices to minimize emissions.

4. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

5. The permittee shall submit annual reports which specify the total VOC ~~and PM-PM10~~ emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

## V. Testing Requirements

1. The permittee may determine the VOC content of materials based on formulation data, and may rely on volatile matter content data provided by material suppliers. In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR Part 60, Subpart A, Test Methods 24 or 24A shall be used unless the permittee can demonstrate to the satisfaction of the agency that the formulation data is correct.

2. Emission limitation:
   Visible particulate emissions shall not exceed 20 percent opacity, as a 3-minute average, except as specified by rule.

   Applicable Compliance Method:
   Compliance with the visible particulate emission limitation shall be demonstrated by the methods outlined in 40 CFR Part 60, Appendix A, Method 9.

3. Emission limitation:
   4.70 lbs. of VOC/hr

   Applicable compliance method:
   Compliance with the VOC emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.4-1 (5/83), Uncontrolled emission factors for paint and varnish manufacturing.

4. Emission limitation:
   20.56 TPY of VOC

   Applicable Compliance Method:

Compliance shall be determined based on record keeping in Term A.III.3.

5. Emission limitation:
39.9 TPY VOC, based upon a rolling, 12-month summation from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined and 9.9 TPY for single HAP and 24.9 TPY for combined HAPs (sum of all single HAPs) from the facility.

   Applicable Compliance Method:
   Compliance shall be determined based on record keeping in Terms A.III.1 and A.III.2.

6. Emission limitation
0.14 lb of PM-PM10/hr

   Applicable compliance method:
   Compliance with the particulate and PM-10 emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.7-1 (5/83), Emission factors for printing ink manufacturing.

7. Emission limitation
0.60 TPY of PM/PM10

   Applicable compliance method:
   Compliance with the particulate and PM-10 emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.7-1 (5/83), Emission factors for printing ink manufacturing, multiplied by the sum of all pigment usage totals in term A.III.1.c.

8. Compliance with the VOC input limit in term A.I.2.c shall be determined by the record keeping in term A.III.2.

## VI. Miscellaneous Requirements

None

**B. State Only Enforceable Section**

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

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

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| P490 - High Speed Disperser 7, equipment ~~ID 34-21-103M~~ ***ID 34-12-105M*** | | |

**2. Additional Terms and Conditions**

**2.a** None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

1. The permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Xylene

TLV (ug/m3): 434,192

Maximum Hourly Emission Rate (lbs/hr): 36.1
(Emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507, combined)

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 6997

MAGLC (ug/m3): 10,338

Physical changes to or in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the " Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s)to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required.

If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

a. A description of the parameters changed(composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. When the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

## V. Testing Requirements

None

## VI. Miscellaneous Requirements

None

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

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

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

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | |
|---|---|---|
| | | OAC rule 3745-17-08(B) |
| P491 - High Speed Disperser 8, equipment ~~ID 34-21-105M~~ ***ID 34-12-106M*** | OAC rule 3745-31-05 (A)(3) | |
| | | OAC rule 3745-17-07(B)(1) |
| | OAC rule 3745-31-05 (D) | |

| Applicable Emissions Limitations/Control Measures | |
|---|---|
| Particulate matter-particulate matter less than 10 microns (PM-PM10) emissions shall not exceed 0.14 pound ( lb)/hour (hr*) and 0.60 ton per year (TPY); volatile organic compound (VOC) emissions shall not exceed 4.70 lb VOC/hr* and 20.6 TPY VOC.<br><br>See Term A.2.a<br><br>*The hourly emissions limitation is based on the maximum capacity of the equipment and thus, no hourly record keeping is required.<br><br>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(B)(1), 3745-17-08(B), and 3745-31-05(D).<br><br>VOC emissions shall not exceed 39.9 TPY based on a rolling, 12-month summation.<br><br>See Terms A.2.b and A.2.c | The permittee shall unload all solid materials in a manner to minimize or eliminate visible particulate emissions.<br><br>Visible particulate emissions shall not exceed 20% opacity, as a three- minute average, except as specified by rule. |

**2. Additional Terms and Conditions**

**2.a** Compliance with OAC rule 3745-31-05(A)(3) (BAT) shall be demonstrated by the use of a building enclosure for control of particulate emissions, use of covers for control of volatile organic compound emissions, VOC input limitations and compliance with the Ohio Air Toxics Policy.

**2.b** The total combined emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation and the permittee will use existing records along with records required in this permit to demonstrate compliance with this limit upon issuance of the permit.

**2.c** The total VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined shall not exceed 2660 tons per year based upon a rolling, 12-month summation of the VOC input.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the VOC input levels specified in the following table:

| Month(s) | Maximum Allowable VOC Input (Tons) |
|---|---|
| 1 | 444 |
| 1-2 | 888 |
| 1-3 | 1110 |
| 1-4 | 1332 |
| 1-5 | 1554 |
| 1-6 | 1776 |
| 1-7 | 1998 |
| 1-8 | 2220 |
| 1-9 | 2442 |
| 1-10 | 2660 |
| 1-11 | 2660 |
| 1-12 | 2660 |

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual VOC input limit shall be based upon a rolling, 12-month summation of the VOC input.

## II. Operational Restrictions

1. The permittee shall not operate this emission unit without the use of a ~~tight fitting~~ lid designed using good manufacturing practices to minimize emissions.

## III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month:

   a. The identification of each batch made (product code).

   b. The batch size, in pounds.

   c. The total pigment content of each batch, in pounds.

   d. The liquid volatile organic compound input for each batch, in pounds.

   e. The individual organic HAP content of each batch, in pounds of individual HAP.

   f. The total combined organic HAP content of each batch, in pounds of combined HAP [sum of all the individual organic HAP contents from (e)].

   g. If any inorganic HAP materials are employed, the individual inorganic HAP content of each batch, in pounds of individual HAP.

   h. If any inorganic HAP materials are employed, the total combined inorganic HAP content of each batch, in pounds of combined HAP [sum of all the individual inorganic HAP contents from (g)].

   i. The liquid organic cleanup material employed, in pounds.

   j. If any organic HAP containing cleanup materials are employed, the individual organic HAP content of each cleanup material, in ~~pounds~~ percent by weight of individual HAP.

   k. If any organic HAP containing cleanup materials are employed, the total combined organic HAP content of each cleanup material, in ~~pounds~~ percent by weight of combined HAP [sum of all the individual organic HAP contents from (j)].

   l. The total monthly emissions, in pounds, calculated as below:

      Monthly~~OC~~ VOC emissions =
      sum of [(d) * 0.015 lb VOC emissions/lb VOC input] for all batches made per month +

(i).

Monthly single HAP emissions for each HAP =
sum of [(e) * 0.015 lb HAP emissions/lb HAP] for all batches made per month + sum of [(g) * 0.001 lb HAP emissions/lb HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of (i * j) for all liquid organic cleanup materials used.

Monthly total HAP emissions =
sum of [(f) * 0.015 lb HAP emissions/lb HAP ] for all batches made + sum of [(h) * 0.001 lb HAP emissions/lb HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of all (i * k) for all liquid organic cleanup materials used.

m. The rolling, 12-month summation of VOC emissions, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined calculated as below:

Rolling, 12-month summation of VOC emissions = (monthly VOC emissions from (l) + sum of monthly VOC emissions from previous 11 calendar months)/2000.

2. The permittee shall maintain monthly records of the following:

a. The total monthly VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined, in tons.

b. The rolling, 12-month summation of the VOC input, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined calculated as below:

Rolling, 12-month summation of VOC input = (monthly VOC input from (a) + sum of monthly VOC input from previous 11 calendar months)

Also during the first 12 calendar months of operation following issuance of this permit, the permittee shall record the cumulative VOC input for each calendar month.

c. The monthly single HAP emissions from all facility emissions units combined, in pounds, for each single HAP.

d. The rolling, 12-month summation of single HAP emissions, in tons, from all facility emission units combined calculated as below for each single HAP:

Rolling, 12-month summation of single HAP emissions = (monthly single HAP emissions from (c) + sum of monthly single HAP emissions from previous 11 calendar months)/2000.

e. The monthly total HAPs (sum of all single HAPs) emissions from all facility emissions units combined, in pounds.

f. The rolling, 12-month summation of total HAPs (sum of all single HAPs) emissions, in tons, from all facility emissions units combined calculated as below:

Rolling, 12-month summation of total HAPs (sum of all single HAPs) emissions = (monthly total HAPs emissions from (e) + sum of monthly total HAPs emissions from previous 11 calendar months)/2000.

3. The permittee shall collect and record the following information for the purpose of determining annual VOC emissions:

a. The identification of each batch made (product code).

b. The batch size, in pounds.

c. The liquid volatile organic compound input for each batch, in pounds.

d. The liquid volatile organic compound cleanup material employed, in pounds.

e. The total VOC emissions from all batches produced and cleanup materials employed, in pounds or tons.

4. The permittee shall maintain a record indicating that a ~~tightly fitting~~ cover designed using good engineering **practices to minimize emissions** is used whenever this emissions unit is in operation.

## IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for VOC emissions and VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative VOC input levels.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month HAP emission limitations for the facility as set forth in term A.2.b. The

permittee shall submit quarterly reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance.

3. The permittee shall submit control measure deviation (excursion) reports that identify all periods of time when the emission unit was in operation without the use of a ~~tightly fitting~~ lid designed using good engineering practices to minimize emissions.

4. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

5. The permittee shall submit annual reports which specify the total VOC ~~and PM-PM10~~ emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

## V. Testing Requirements

1. The permittee may determine the VOC content of materials based on formulation data, and may rely on volatile matter content data provided by material suppliers. In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR Part 60, Subpart A, Test Methods 24 or 24A shall be used unless the permittee can demonstrate to the satisfaction of the agency that the formulation data is correct.

2. Emission limitation:
Visible particulate emissions shall not exceed 20 percent opacity, as a 3-minute average, except as specified by rule.

Applicable Compliance Method:
Compliance with the visible particulate emission limitation shall be demonstrated by the methods outlined in 40 CFR Part 60, Appendix A, Method 9.

3. Emission limitation:
4.70 lbs. of VOC/hr

Applicable compliance method:
Compliance with the VOC emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.4-1 (5/83), Uncontrolled emission factors for paint and varnish manufacturing.

4. Emission limitation:
20.56 TPY of VOC

Applicable Compliance Method:
Compliance shall be determined based on record keeping in Term A.III.3.

5. Emission limitation:
39.9 TPY VOC, based upon a rolling, 12-month summation from emissions units P476, P477,

P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined and 9.9 TPY for single HAP and 24.9 TPY for combined HAPs (sum of all single HAPs) from the facility.

Applicable Compliance Method:
Compliance shall be determined based on record keeping in Terms A.III.1 and A.III.2.

6. Emission limitation
0.14 lb of PM-PM10/hr

Applicable compliance method:
Compliance with the particulate and PM-10 emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.7-1 (5/83), Emission factors for printing ink manufacturing.

7. Emission limitation
0.60 TPY of PM/PM10

Applicable compliance method:
Compliance with the particulate and PM-10 emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.7-1 (5/83), Emission factors for printing ink manufacturing, multiplied by the sum of all pigment usage totals in term A.III.1.c.

8. Compliance with the VOC input limit in term A.I.2.c shall be determined by the record keeping in term A.III.2.

## VI. Miscellaneous Requirements

None

**B. State Only Enforceable Section**

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

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

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| P491 - High Speed Disperser 8, equipment ~~ID 34-21-105M~~ ***ID 34-12-106M*** | | |

**2. Additional Terms and Conditions**

**2.a** None

**II. Operational Restrictions**

None

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

1. The permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Xylene

TLV (ug/m3): 434,192

Maximum Hourly Emission Rate (lbs/hr): 36.1
(Emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507, combined)

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 6997

MAGLC (ug/m3): 10,338

Physical changes to or in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the " Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s)to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

a. A description of the parameters changed(composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. When the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

## IV. Reporting Requirements

None

## V. Testing Requirements

None

## VI. Miscellaneous Requirements

None

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

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

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

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | |
|---|---|---|
| | | OAC rule 3745-17-08(B) |
| P492 - High Speed Disperser 9, equipment ~~ID 34-21-102M~~ ***ID 34-12-108M*** | OAC rule 3745-31-05 (A)(3) | |
| | | OAC rule 3745-17-07(B)(1) |
| | OAC rule 3745-31-05 (D) | |

| Applicable Emissions Limitations/Control Measures | |
|---|---|
| Particulate matter-particulate matter less than 10 microns (PM-PM10) emissions shall not exceed 0.14 pound (lb)/hour (hr*) and 0.60 ton per year (TPY); volatile organic compound (VOC) emissions shall not exceed 4.70 lbs/ hr* and 20.6 TPY.<br><br>See Term A.2.a<br><br>*The hourly emissions limitation is based on the maximum capacity of the equipment and thus, no hourly record keeping is required.<br><br>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(B)(1), 3745-17-08(B), and 3745-31-05(D).<br><br>VOC emissions shall not exceed 39.9 TPY based on a rolling, 12-month summation.<br><br>See Terms A.2.b and A.2.c<br><br>The permittee shall unload all | solid materials in a manner to minimize or eliminate visible particulate emissions.<br><br>Visible particulate emissions shall not exceed 20% opacity, as a three- minute average, except as specified by rule. |

**2. Additional Terms and Conditions**

**2.a** Compliance with OAC rule 3745-31-05(A)(3) (BAT) shall be demonstrated by the use of a building enclosure for control of particulate emissions, use of covers for control of volatile organic compound emissions, VOC input limitations and compliance with the Ohio Air Toxics Policy.

**2.b** The total combined emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation and the permittee will use existing records along with records required in this permit to demonstrate compliance with this limit upon issuance of the permit.

**2.c** The total VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined shall not exceed 2660 tons per year based upon a rolling, 12-month summation of the VOC input.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the VOC input levels specified in the following table:

| Month(s) | Maximum Allowable VOC Input (Tons) |
|---|---|
| 1 | 444 |
| 1-2 | 888 |
| 1-3 | 1110 |
| 1-4 | 1332 |
| 1-5 | 1554 |
| 1-6 | 1776 |
| 1-7 | 1998 |
| 1-8 | 2220 |
| 1-9 | 2442 |
| 1-10 | 2660 |
| 1-11 | 2660 |
| 1-12 | 2660 |

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual VOC input limit shall be based upon a rolling, 12-month summation of the VOC input.

## II. Operational Restrictions

1. The permittee shall not operate this emission unit without the use of a ~~tight fitting~~ lid designed using good manufacturing practices to minimize emissions.

## III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month:

a. The identification of each batch made (product code).

b. The batch size, in pounds.

c. The total pigment content of each batch, in pounds.

d. The liquid volatile organic compound input for each batch, in pounds.

e. The individual organic HAP content of each batch, in pounds of individual HAP.

f. The total combined organic HAP content of each batch, in pounds of combined HAP [sum of all the individual organic HAP contents from (e)].

g. If any inorganic HAP materials are employed, the individual inorganic HAP content of each batch, in pounds of individual HAP.

h. If any inorganic HAP materials are employed, the total combined inorganic HAP content of each batch, in pounds of combined HAP [sum of all the individual inorganic HAP contents from (g)].

i. The liquid organic cleanup material employed, in pounds.

j. If any organic HAP containing cleanup materials are employed, the individual organic HAP content of each cleanup material, in ~~pounds~~ percent by weight of individual HAP.

k. If any organic HAP containing cleanup materials are employed, the total combined organic HAP content of each cleanup material, in ~~pounds~~ percent by weight of combined HAP [sum of all the individual organic HAP contents from (j)].

l. The total monthly emissions, in pounds, calculated as below:

Monthly~~OC~~ VOC emissions =
sum of [(d) * 0.015 lb VOC emissions/lb VOC input] for all batches made per month + (i).

Monthly single HAP emissions for each HAP =
sum of [(e) * 0.015 lb HAP emissions/lb HAP] for all batches made per month + sum of [(g) * 0.001 lb HAP emissions/lb HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of (i * j) for all liquid organic cleanup materials used.

Monthly total HAP emissions =
sum of [(f) * 0.015 lb HAP emissions/lb HAP ] for all batches made + sum of [(h) * 0.001 lb HAP emissions/lb HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of all (i * k) for all liquid organic cleanup materials used.

m. The rolling, 12-month summation of VOC emissions, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined calculated as below:

Rolling, 12-month summation of VOC emissions = (monthly VOC emissions from (l) + sum of monthly VOC emissions from previous 11 calendar months)/2000.

2. The permittee shall maintain monthly records of the following:

a. The total monthly VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined, in tons.

b. The rolling, 12-month summation of the VOC input, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined calculated as below:

Rolling, 12-month summation of VOC input = (monthly VOC input from (a) + sum of monthly VOC input from previous 11 calendar months)

Also during the first 12 calendar months of operation following issuance of this permit, the permittee shall record the cumulative VOC input for each calendar month.

c. The monthly single HAP emissions from all facility emissions units combined, in pounds, for each single HAP.

d. The rolling, 12-month summation of single HAP emissions, in tons, from all facility emission units combined calculated as below for each single HAP:

Rolling, 12-month summation of single HAP emissions = (monthly single HAP emissions from (c) + sum of monthly single HAP emissions from previous 11 calendar months)/2000.

e. The monthly total HAPs (sum of all single HAPs) emissions from all facility emissions units combined, in pounds.

f. The rolling, 12-month summation of total HAPs (sum of all single HAPs) emissions, in tons, from all facility emissions units combined calculated as below:

Rolling, 12-month summation of total HAPs (sum of all single HAPs) emissions = (monthly total HAPs emissions from (e) + sum of monthly total HAPs emissions from previous 11 calendar months)/2000.

3. The permittee shall collect and record the following information for the purpose of determining annual VOC emissions:

a. The identification of each batch made (product code).

b. The batch size, in pounds.

c. The liquid volatile organic compound input for each batch, in pounds.

d. The liquid volatile organic compound cleanup material employed, in pounds.

e. The total VOC emissions from all batches produced and cleanup materials employed, in pounds or tons.

4. The permittee shall maintain a record indicating that a ~~tightly fitting~~ cover designed using good engineering **practices to minimize emissions** is used whenever this emissions unit is in operation.

## IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for VOC emissions and VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative VOC input levels.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month HAP emission limitations for the facility as set forth in term A.2.b. The permittee shall submit quarterly reports which identify all exceedances of these limitations, as

well as the corrective actions that were taken to achieve compliance.

3. The permittee shall submit control measure deviation (excursion) reports that identify all periods of time when the emission unit was in operation without the use of a ~~tightly fitting~~ lid designed using good engineering practices to minimize emissions.

4. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

5. The permittee shall submit annual reports which specify the total VOC ~~and PM-PM10~~ emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

## V. Testing Requirements

1. The permittee may determine the VOC content of materials based on formulation data, and may rely on volatile matter content data provided by material suppliers. In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR Part 60, Subpart A, Test Methods 24 or 24A shall be used unless the permittee can demonstrate to the satisfaction of the agency that the formulation data is correct.

2. Emission limitation:
Visible particulate emissions shall not exceed 20 percent opacity, as a 3-minute average, except as specified by rule.

Applicable Compliance Method:
Compliance with the visible particulate emission limitation shall be demonstrated by the methods outlined in 40 CFR Part 60, Appendix A, Method 9.

3. Emission limitation:
4.70 lbs. of VOC/hr

Applicable compliance method:
Compliance with the VOC emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.4-1 (5/83), Uncontrolled emission factors for paint and varnish manufacturing.

4. Emission limitation:
20.56 TPY of VOC

Applicable Compliance Method:
Compliance shall be determined based on record keeping in Term A.III.3.

5. Emission limitation:
39.9 TPY VOC, based upon a rolling, 12-month summation from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined and 9.9

TPY for single HAP and 24.9 TPY for combined HAPs (sum of all single HAPs) from the facility.

Applicable Compliance Method:
Compliance shall be determined based on record keeping in Terms A.III.1 and A.III.2.

6. Emission limitation
0.14 lb of PM-PM10/hr

Applicable compliance method:
Compliance with the particulate and PM-10 emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.7-1 (5/83), Emission factors for printing ink manufacturing.

7. Emission limitation
0.60 TPY of PM/PM10

Applicable compliance method:
Compliance with the particulate and PM-10 emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.7-1 (5/83), Emission factors for printing ink manufacturing, multiplied by the sum of all pigment usage totals in term A.III.1.c.

8. Compliance with the VOC input limit in term A.I.2.c shall be determined by the record keeping in term A.III.2.

## VI. Miscellaneous Requirements

None

**B. State Only Enforceable Section**

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

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

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| P492 - High Speed Disperser 9, equipment ~~ID 34-21-102M~~ ***ID 34-12-108M*** | | |

**2. Additional Terms and Conditions**

**2.a** None

**II. Operational Restrictions**

None

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

1. The permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Xylene

TLV (ug/m3): 434,192

Maximum Hourly Emission Rate (lbs/hr): 36.1
(Emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507, combined)

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 6997

MAGLC (ug/m3): 10,338

Physical changes to or in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the " Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s)to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

a. A description of the parameters changed(composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. When the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

## IV. Reporting Requirements

None

## V. Testing Requirements

None

## VI. Miscellaneous Requirements

None

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

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

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

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | |
|---|---|---|
| P493 - High Speed Disperser 10, equipment ID undecided. | OAC rule 3745-31-05 (A)(3) | OAC rule 3745-17-08(B) |
| | | OAC rule 3745-17-07(B)(1) |
| | OAC rule 3745-31-05 (D) | |

| Applicable Emissions Limitations/Control Measures | |
|---|---|
| Particulate matter-particulate less than 10 microns (PM-PM10) emissions shall not exceed 0.14 pound (lb)/hour (hr*) and 0.60 ton per year (TPY); volatile organic compound (VOC) emissions shall not exceed 4.70 lb VOC/hr* and 20.6 TPY VOC.<br><br>See Term A.2.a<br><br>*The hourly emissions limitation is based on the maximum capacity of the equipment and thus, no hourly record keeping is required.<br><br>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(B)(1), 3745-17-08(B), and 3745-31-05(D).<br><br>VOC emissions shall not exceed 39.9 TPY based on a rolling, 12-month summation. | See Terms A.2.b and A.2.c<br><br>The permittee shall unload all solid materials in a manner to minimize or eliminate visible particulate emissions.<br><br>Visible particulate emissions shall not exceed 20% opacity, as a three-minute average, except as specified by rule. |

**2. Additional Terms and Conditions**

**2.a** Compliance with OAC rule 3745-31-05(A)(3) (BAT) shall be demonstrated by the use of a building enclosure for control of particulate emissions, use of covers for control of volatile organic compound emissions, VOC input limitations and compliance with the Ohio Air Toxics Policy.

**2.b** The total combined emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation and the permittee will use existing records along with records required with this permit to demonstrate compliance with this limit upon issuance of the permit.

**2.c** The total VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined shall not exceed 2660 tons per year based upon a rolling, 12-month summation of the VOC input.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the VOC input levels specified in the following table:

| Month(s) | Maximum Allowable VOC Input (Tons) |
|---|---|
| 1 | 444 |
| 1-2 | 888 |
| 1-3 | 1110 |
| 1-4 | 1332 |
| 1-5 | 1554 |
| 1-6 | 1776 |
| 1-7 | 1998 |
| 1-8 | 2220 |
| 1-9 | 2442 |
| 1-10 | 2660 |
| 1-11 | 2660 |
| 1-12 | 2660 |

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual VOC input limit shall be based upon a rolling, 12-month summation of the VOC input.

## II. Operational Restrictions

1. The permittee shall not operate this emission unit without the use of a ~~tight fitting~~ lid designed using good manufacturing practices to minimize emissions.

## III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month:

a. The identification of each batch made (product code).

b. The batch size, in pounds.

c. The total pigment content of each batch, in pounds.

d. The liquid volatile organic compound input for each batch, in pounds.

e. The individual organic HAP content of each batch, in pounds of individual HAP.

f. The total combined organic HAP content of each batch, in pounds of combined HAP [sum of all the individual organic HAP contents from (e)].

g. If any inorganic HAP materials are employed, the individual inorganic HAP content of each batch, in pounds of individual HAP.

h. If any inorganic HAP materials are employed, the total combined inorganic HAP content of each batch, in pounds of combined HAP [sum of all the individual inorganic HAP contents from (g)].

i. The liquid organic cleanup material employed, in pounds.

j. If any organic HAP containing cleanup materials are employed, the individual organic HAP content of each cleanup material, in ~~pounds~~ percent by weight of individual HAP.

k. If any organic HAP containing cleanup materials are employed, the total combined organic HAP content of each cleanup material, in ~~pounds~~ percent by weight of combined HAP [sum of all the individual organic HAP contents from (j)].

l. The total monthly emissions, in pounds, calculated as below:

Monthly~~OC~~ VOC emissions =
sum of [(d) * 0.015 lb VOC emissions/lb VOC input] for all batches made per month + (i).

Monthly single HAP emissions for each HAP =
sum of [(e) * 0.015 lb HAP emissions/lb HAP] for all batches made per month + sum of [(g) * 0.001 lb HAP emissions/lb HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of (i * j) for all liquid organic cleanup materials used.

Monthly total HAP emissions =
sum of [(f) * 0.015 lb HAP emissions/lb HAP ] for all batches made + sum of [(h) * 0.001 lb HAP emissions/lb HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of all (i * k) for all liquid organic cleanup materials used.

m. The rolling, 12-month summation of VOC emissions, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined calculated as below:

Rolling, 12-month summation of VOC emissions = (monthly VOC emissions from (l) + sum of monthly VOC emissions from previous 11 calendar months)/2000.

2. The permittee shall maintain monthly records of the following:

a. The total monthly VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined, in tons.

b. The rolling, 12-month summation of the VOC input, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined calculated as below:

Rolling, 12-month summation of VOC input = (monthly VOC input from (a) + sum of monthly VOC input from previous 11 calendar months)

Also during the first 12 calendar months of operation following issuance of this permit, the permittee shall record the cumulative VOC input for each calendar month.

c. The monthly single HAP emissions from all facility emissions units combined, in pounds, for each single HAP.

d. The rolling, 12-month summation of single HAP emissions, in tons, from all facility emission units units combined calculated as below for each single HAP:

Rolling, 12-month summation of single HAP emissions = (monthly single HAP emissions from (c) + sum of monthly single HAP emissions from previous 11 calendar months)/2000.

e. The monthly total HAPs (sum of all single HAPs) emissions from all facility emissions units combined, in pounds.

f. The rolling, 12-month summation of total HAPs (sum of all single HAPs) emissions, in tons, from all facility emissions units combined calculated as below:

Rolling, 12-month summation of total HAPs (sum of all single HAPs) emissions = (monthly total HAPs emissions from (e) + sum of monthly total HAPs emissions from previous 11 calendar months)/2000.

3. The permittee shall collect and record the following information for the purpose of determining annual VOC emissions:

a. The identification of each batch made (product code).

b. The batch size, in pounds.

c. The liquid volatile organic compound input for each batch, in pounds.

d. The liquid volatile organic compound cleanup material employed, in pounds.

e. The total VOC emissions from all batches produced and cleanup materials employed, in pounds or tons.

4. The permittee shall maintain a record indicating that a ~~tightly fitting~~ cover designed using good engineering **practices to minimize emissions** is used whenever this emissions unit is in operation.

## IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for VOC emissions and VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative VOC input levels.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month HAP emission limitations for the facility as set forth in term A.2.b. The permittee shall submit quarterly reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance.

3. The permittee shall submit control measure deviation (excursion) reports that identify all periods of time when the emission unit was in operation without the use of a ~~tightly fitting~~ lid designed using good engineering practices to minimize emissions.

4. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

5. The permittee shall submit annual reports which specify the total VOC ~~and PM-PM10~~ emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

## V. Testing Requirements

1. The permittee may determine the VOC content of materials based on formulation data, and may rely on volatile matter content data provided by material suppliers. In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR Part 60, Subpart A, Test Methods 24 or 24A shall be used unless the permittee can demonstrate to the satisfaction of the agency that the formulation data is correct.

2. Emission limitation:
Visible particulate emissions shall not exceed 20 percent opacity, as a 3-minute average, except as specified by rule.

Applicable Compliance Method:
Compliance with the visible particulate emission limitation shall be demonstrated by the methods outlined in 40 CFR Part 60, Appendix A, Method 9.

3. Emission limitation:
4.70 lbs. of VOC/hr

Applicable compliance method:
Compliance with the VOC emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.4-1 (5/83), Uncontrolled emission factors for paint and varnish manufacturing.

4. Emission limitation:
20.56 TPY of VOC

Applicable Compliance Method:
Compliance shall be determined based on record keeping in Term A.III.3.

5. Emission limitation:
39.9 TPY VOC, based upon a rolling, 12-month summation from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined and 9.9 TPY for single HAP and 24.9 TPY for combined HAPs (sum of all single HAPs) from the facility.

Applicable Compliance Method:
Compliance shall be determined based on record keeping in Terms A.III.1 and A.III.2.

6. Emission limitation

0.14 lb of PM-PM10/hr

Applicable compliance method:
Compliance with the particulate and PM-10 emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.7-1 (5/83), Emission factors for printing ink manufacturing.

7. Emission limitation
0.60 TPY of PM/PM10

Applicable compliance method:
Compliance with the particulate and PM-10 emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.7-1 (5/83), Emission factors for printing ink manufacturing, multiplied by the sum of all pigment usage totals in term A.III.1.c.

8. Compliance with the VOC input limit in term A.I.2.c shall be determined by the record keeping in term A.III.2.

## VI. Miscellaneous Requirements

None

**B. State Only Enforceable Section**

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

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

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| P493 - High Speed Disperser 10, equipment ID undecided. | | |

**2. Additional Terms and Conditions**

**2.a** None

**II. Operational Restrictions**

None

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

1. The permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Xylene

TLV (ug/m3): 434,192

Maximum Hourly Emission Rate (lbs/hr): 36.1
(Emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507, combined)

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 6997

MAGLC (ug/m3): 10,338

Physical changes to or in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the " Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s)to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

a. A description of the parameters changed(composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. When the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

## IV. Reporting Requirements

None

## V. Testing Requirements

None

## VI. Miscellaneous Requirements

None

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

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

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

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | |
|---|---|---|
| P494 - High Speed Disperser 11, equipment ID undecided. | OAC rule 3745-31-05 (A)(3) | OAC rule 3745-17-08(B) |
| | | OAC rule 3745-17-07(B)(1) |
| | OAC rule 3745-31-05 (D) | |

| Applicable Emissions Limitations/Control Measures | |
|---|---|
| Particulate matter-particulate matter less than 10 microns (PM-PM10) emissions shall not exceed 0.14 pound (lb)/hour (hr*) and 0.60 ton per year (TPY); volatile organic compound (VOC) emissions shall not exceed 4.70 lb/hr* and 20.6 TPY.<br><br>See Term A.2.a<br><br>*The hourly emissions limitation is based on the maximum capacity of the equipment and thus, no hourly record keeping is required.<br><br>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(B)(1), 3745-17-08(B), and 3745-31-05(D).<br><br>VOC emissions shall not exceed 39.9 TPY based on a rolling, 12-month summation. | See Terms A.2.b and A.2.c<br><br>The permittee shall unload all solid materials in a manner to minimize or eliminate visible particulate emissions.<br><br>Visible particulate emissions shall not exceed 20% opacity, as a three-minute average, except as specified by rule. |

**2. Additional Terms and Conditions**

**2.a** Compliance with OAC rule 3745-31-05(A)(3) (BAT) shall be demonstrated by the use of a building enclosure for control of particulate emissions, use of covers for control of volatile organic compound emissions, VOC input limitations and compliance with the Ohio Air Toxics Policy.

**2.b** The total combined emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation and the permittee will use existing records along with the records required in this permit to demonstrate compliance with this limit upon issuance of the permit.

**2.c** The total VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined shall not exceed 2660 tons per year based upon a rolling, 12-month summation of the VOC input.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the VOC input levels specified in the following table:

| Month(s) | Maximum Allowable VOC Input (Tons) |
|---|---|
| 1 | 444 |
| 1-2 | 888 |
| 1-3 | 1110 |
| 1-4 | 1332 |
| 1-5 | 1554 |
| 1-6 | 1776 |
| 1-7 | 1998 |
| 1-8 | 2220 |
| 1-9 | 2442 |
| 1-10 | 2660 |
| 1-11 | 2660 |
| 1-12 | 2660 |

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual VOC input limit shall be based upon a rolling, 12-month summation of the VOC

input.

## II. Operational Restrictions

1. The permittee shall not operate this emission unit without the use of a ~~tight fitting~~ lid designed using good manufacturing practices to minimize emissions.

## III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month:

a. The identification of each batch made (product code).

b. The batch size, in pounds.

c. The total pigment content of each batch, in pounds.

d. The liquid volatile organic compound input for each batch, in pounds.

e. The individual organic HAP content of each batch, in pounds of individual HAP.

f. The total combined organic HAP content of each batch, in pounds of combined HAP [sum of all the individual organic HAP contents from (e)].

g. If any inorganic HAP materials are employed, the individual inorganic HAP content of each batch, in pounds of individual HAP.

h. If any inorganic HAP materials are employed, the total combined inorganic HAP content of each batch, in pounds of combined HAP [sum of all the individual inorganic HAP contents from (g)].

i. The liquid organic cleanup material employed, in pounds.

j. If any organic HAP containing cleanup materials are employed, the individual organic HAP content of each cleanup material, in ~~pounds~~ percent by weight of individual HAP.

k. If any organic HAP containing cleanup materials are employed, the total combined organic HAP content of each cleanup material, in ~~pounds~~ percent by weight of combined HAP [sum of all the individual organic HAP contents from (j)].

l. The total monthly emissions, in pounds, calculated as below:

Monthly~~OC~~ VOC emissions =
sum of [(d) * 0.015 lb VOC emissions/lb VOC input] for all batches made per month + (i).

Monthly single HAP emissions for each HAP =
sum of [(e) * 0.015 lb HAP emissions/lb HAP] for all batches made per month + sum of [(g) *

0.001 lb HAP emissions/lb HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of (i * j) for all liquid organic cleanup materials used.

Monthly total HAP emissions =
sum of [(f) * 0.015 lb HAP emissions/lb HAP ] for all batches made + sum of [(h) * 0.001 lb HAP emissions/lb HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of all (i * k) for all liquid organic cleanup materials used.

m. The rolling, 12-month summation of VOC emissions, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined calculated as below:

Rolling, 12-month summation of VOC emissions = (monthly VOC emissions from (l) + sum of monthly VOC emissions from previous 11 calendar months)/2000.

2. The permittee shall maintain monthly records of the following:

a. The total monthly VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined, in tons.

b. The rolling, 12-month summation of the VOC input, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined calculated as below:

Rolling, 12-month summation of VOC input = (monthly VOC input from (a) + sum of monthly VOC input from previous 11 calendar months)

Also during the first 12 calendar months of operation following issuance of this permit, the permittee shall record the cumulative VOC input for each calendar month.

c. The monthly single HAP emissions from all facility emissions units combined, in pounds, for each single HAP.

d. The rolling, 12-month summation of single HAP emissions, in tons, from all facility emission units combined calculated as below for each single HAP:

Rolling, 12-month summation of single HAP emissions = (monthly single HAP emissions from (c)

+ sum of monthly single HAP emissions from previous 11 calendar months)/2000.

e. The monthly total HAPs (sum of all single HAPs) emissions from all facility emissions units combined, in pounds.

f. The rolling, 12-month summation of total HAPs (sum of all single HAPs) emissions, in tons, from all facility emissions units combined calculated as below:

Rolling, 12-month summation of total HAPs (sum of all single HAPs) emissions = (monthly total HAPs emissions from (e) + sum of monthly total HAPs emissions from previous 11 calendar months)/2000.

3. The permittee shall collect and record the following information for the purpose of determining annual VOC emissions:

a. The identification of each batch made (product code).

b. The batch size, in pounds.

c. The liquid volatile organic compound input for each batch, in pounds.

d. The liquid volatile organic compound cleanup material employed, in pounds.

e. The total VOC emissions from all batches produced and cleanup materials employed, in pounds or tons.

4. The permittee shall maintain a record indicating that a ~~tightly fitting~~ cover designed using good engineering **practices to minimize emissions** is used whenever this emissions unit is in operation.

## IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for VOC emissions and VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative VOC input levels.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month HAP emission limitations for the facility as set forth in term A.2.b. The permittee shall submit quarterly reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance.

3. The permittee shall submit control measure deviation (excursion) reports that identify all periods of time when the emission unit was in operation without the use of a ~~tightly fitting~~ lid designed using good engineering practices to minimize emissions.

4. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

5. The permittee shall submit annual reports which specify the total VOC ~~and PM-PM10~~ emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

## V. Testing Requirements

1. The permittee may determine the VOC content of materials based on formulation data, and may rely on volatile matter content data provided by material suppliers. In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR Part 60, Subpart A, Test Methods 24 or 24A shall be used unless the permittee can demonstrate to the satisfaction of the agency that the formulation data is correct.

2. Emission limitation:
Visible particulate emissions shall not exceed 20 percent opacity, as a 3-minute average, except as specified by rule.

Applicable Compliance Method:
Compliance with the visible particulate emission limitation shall be demonstrated by the methods outlined in 40 CFR Part 60, Appendix A, Method 9.

3. Emission limitation:
4.70 lbs. of VOC/hr

Applicable compliance method:
Compliance with the VOC emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.4-1 (5/83), Uncontrolled emission factors for paint and varnish manufacturing.

4. Emission limitation:
20.56 TPY of VOC

Applicable Compliance Method:
Compliance shall be determined based on record keeping in Term A.III.3.

5. Emission limitation:
39.9 TPY VOC, based upon a rolling, 12-month summation from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494,

P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined and 9.9 TPY for single HAP and 24.9 TPY for combined HAPs (sum of all single HAPs) from the facility.

Applicable Compliance Method:
Compliance shall be determined based on record keeping in Terms A.III.1 and A.III.2.

6. Emission limitation
0.14 lb of PM-PM10/hr

Applicable compliance method:
Compliance with the particulate and PM-10 emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.7-1 (5/83), Emission factors for printing ink manufacturing.

7. Emission limitation
0.60 TPY of PM/PM10

Applicable compliance method:
Compliance with the particulate and PM-10 emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.7-1 (5/83), Emission factors for printing ink manufacturing, multiplied by the sum of all pigment usage totals in term A.III.1.c.

8. Compliance with the VOC input limit in term A.I.2.c shall be determined by the record keeping in term A.III.2.

## VI. Miscellaneous Requirements

None

**B. State Only Enforceable Section**

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

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

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| P494 - High Speed Disperser 11, equipment ID undecided. | | |

**2. Additional Terms and Conditions**

**2.a** None

**II. Operational Restrictions**

None

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

1. The permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Xylene

TLV (ug/m3): 434,192

Maximum Hourly Emission Rate (lbs/hr): 36.1
(Emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507, combined)

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 6997

MAGLC (ug/m3): 10,338

Physical changes to or in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the " Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s)to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

a. A description of the parameters changed(composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. When the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

## IV. Reporting Requirements

None

## V. Testing Requirements

None

## VI. Miscellaneous Requirements

None

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

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

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

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | |
|---|---|---|
| P495 - Drais Mill 1 DR, equipment ID 34-12-101S | OAC rule 3745-31-05 (A)(3) | OAC rule 3745-17-08(B) |
| | | OAC rule 3745-17-07(B)(1) |
| | OAC rule 3745-31-05 (D) | |

| Applicable Emissions Limitations/Control Measures | |
|---|---|
| Particulate matter-particulate matter less than 10 microns (PM-PM10) emissions shall not exceed 0.03 pound (lb)/hour (hr*) and 0.15 ton per year (TPY); volatile organic compound (VOC) emissions shall not exceed 1.17 lb OC/hr* and 5.14 TPY.<br><br>See Term A.2.a<br><br>*The hourly emissions limitation is based on the maximum capacity of the equipment and thus, no hourly record keeping is required.<br><br>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(B)(1), 3745-17-08(B), and 3745-31-05(D). | rolling, 12-month summation.<br><br>See Terms A.2.b and A.2.c<br><br>The permittee shall unload all solid materials in a manner to minimize or eliminate visible particulate emissions.<br><br>Visible particulate emissions shall not exceed 20% opacity, as a three- minute average, except as specified by rule. |
| VOC emissions shall not exceed 39.9 TPY based on a | |

**2. Additional Terms and Conditions**

**2.a** Compliance with OAC rule 3745-31-05(A)(3) (BAT) shall be demonstrated by the use of a building enclosure for control of particulate emissions, VOC input limitations and compliance with the Ohio Air Toxics Policy.

**2.b** The total combined emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation and the permittee will use existing records along with records required in this permit to demonstrate compliance with this limit upon issuance of the permit.

**2.c** The total VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined shall not exceed 2660 tons per year based upon a rolling, 12-month summation of the VOC input.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the VOC input levels specified in the following table:

| Month(s) | Maximum Allowable VOC Input (Tons) |
|---|---|
| 1 | 444 |
| 1-2 | 888 |
| 1-3 | 1110 |
| 1-4 | 1332 |
| 1-5 | 1554 |
| 1-6 | 1776 |
| 1-7 | 1998 |
| 1-8 | 2220 |
| 1-9 | 2442 |
| 1-10 | 2660 |
| 1-11 | 2660 |
| 1-12 | 2660 |

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual VOC input limit shall be based upon a rolling, 12-month summation of the VOC input.

## II. Operational Restrictions

None

## III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month:

a. The identification of each batch made (product code).

b. The batch size, in pounds.

c. The total pigment content of each batch, in pounds.

d. The liquid volatile organic compound input for each batch, in pounds.

e. The individual organic HAP content of each batch, in pounds of individual HAP.

f. The total combined organic HAP content of each batch, in pounds of combined HAP [sum of all the individual organic HAP contents from (e)].

g. If any inorganic HAP materials are employed, the individual inorganic HAP content of each batch, in pounds of individual HAP.

h. If any inorganic HAP materials are employed, the total combined inorganic HAP content of each batch, in pounds of combined HAP [sum of all the individual inorganic HAP contents from (g)].

i. The liquid organic cleanup material employed, in pounds.

j. If any organic HAP containing cleanup materials are employed, the individual organic HAP content of each cleanup material, in ~~pounds~~ percent by weight of individual HAP.

k. If any organic HAP containing cleanup materials are employed, the total combined organic HAP content of each cleanup material, in ~~pounds~~ percent by weight of combined HAP [sum of all the individual organic HAP contents from (j)].

l. The total monthly emissions, in pounds, calculated as below:

Monthly~~OC~~ VOC emissions =
sum of [(d) * 0.015 lb VOC emissions/lb VOC input] for all batches made per month + (i).

Monthly single HAP emissions for each HAP =
sum of [(e) * 0.015 lb HAP emissions/lb HAP] for all batches made per month + sum of [(g) * 0.001 lb HAP emissions/lb HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of (i * j) for all liquid organic cleanup materials used.
Monthly total HAP emissions =

sum of [(f) * 0.015 lb HAP emissions/lb HAP ] for all batches made + sum of [(h) * 0.001 lb HAP emissions/lb HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of all (i * k) for all liquid organic cleanup materials used.

m. The rolling, 12-month summation of VOC emissions, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined calculated as below:

Rolling, 12-month summation of VOC emissions = (monthly VOC emissions from (l) + sum of monthly VOC emissions from previous 11 calendar months)/2000.

2. The permittee shall maintain monthly records of the following:

a. The total monthly VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined, in tons.

b. The rolling, 12-month summation of the VOC input, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined calculated as below:

Rolling, 12-month summation of VOC input = (monthly VOC input from (a) + sum of monthly VOC input from previous 11 calendar months)

Also during the first 12 calendar months of operation following issuance of this permit, the permittee shall record the cumulative VOC input for each calendar month.

c. The monthly single HAP emissions from all facility emissions units combined, in pounds, for each single HAP.

d. The rolling, 12-month summation of single HAP emissions, in tons, from all facility emission units combined calculated as below for each single HAP:

Rolling, 12-month summation of single HAP emissions = (monthly single HAP emissions from (c) + sum of monthly single HAP emissions from previous 11 calendar months)/2000

e. The monthly total HAPs (sum of all single HAPs) emissions from all facility emissions units combined, in pounds.

f. The rolling, 12-month summation of total HAPs (sum of all single HAPs) emissions, in tons, from all facility emissions units combined calculated as below:

Rolling, 12-month summation of total HAPs (sum of all single HAPs) emissions = (monthly total HAPs emissions from (e) + sum of monthly total HAPs emissions from previous 11 calendar months)/2000.

3. The permittee shall collect and record the following information for the purpose of determining annual VOC emissions:

a. The identification of each batch made (product code).

b. The batch size, in pounds.

c. The liquid volatile organic compound input for each batch, in pounds.

d. The liquid volatile organic compound cleanup material employed, in pounds.

e. The total VOC emissions from all batches produced and cleanup materials employed, in pounds or tons.

## IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for VOC emissions and VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative VOC input levels.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month HAP emission limitations for the facility as set forth in term A.2.b. The permittee shall submit quarterly reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance.

3. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

4. The permittee shall submit annual reports which specify the total VOC ~~and PM-PM10~~ emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

## V. Testing Requirements

1. The permittee may determine the VOC content of materials based on formulation data, and may

rely on volatile matter content data provided by material suppliers. In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR Part 60, Subpart A, Test Methods 24 or 24A shall be used unless the permittee can demonstrate to the satisfaction of the agency that the formulation data is correct.

2. Emission limitation:
Visible particulate emissions shall not exceed 20 percent opacity, as a 3-minute average, except as specified by rule.

Applicable Compliance Method:
Compliance with the visible particulate emission limitation shall be demonstrated by the methods outlined in 40 CFR Part 60, Appendix A, Method 9.

3. Emission limitation:
1.17 lbs. of VOC/hr

Applicable compliance method:
Compliance with the VOC emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.4-1 (5/83), Uncontrolled emission factors for paint and varnish manufacturing.

4. Emission limitation:
5.14 TPY of VOC

Applicable Compliance Method:
Compliance shall be determined based on record keeping in Term A.III.3.

5. Emission limitation:
39.9 TPY VOC, based upon a rolling, 12-month summation from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined and 9.9 TPY for single HAP and 24.9 TPY for combined HAPs (sum of all single HAPs) from the facility.

Applicable Compliance Method:
Compliance shall be determined based on record keeping in Terms A.III.1 and A.III.2.

6. Emission limitation
0.03 lb of PM-PM10/hr

Applicable compliance method:
Compliance with the particulate and PM-10 emissions limitations in term A.1 shall be determined by

emissions factors from AP-42, 6.7-1 (5/83), Emission factors for printing ink manufacturing.

7. Emission limitation
0.15 TPY of PM/PM10

Applicable compliance method:
Compliance with the particulate and PM-10 emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.7-1 (5/83), Emission factors for printing ink manufacturing, multiplied by the sum of all pigment usage totals in term A.III.1.c.

8. Compliance with the VOC input limit in term A.I.2.c shall be determined by the record keeping in term A.III.2.

## VI. Miscellaneous Requirements

None

**B. State Only Enforceable Section**

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

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

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| P495 - Drais Mill 1 DR, equipment ID 34-12-101S | | |

**2. Additional Terms and Conditions**

**2.a** None

**II. Operational Restrictions**

None

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

1. The permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Xylene

TLV (ug/m3): 434,192

Maximum Hourly Emission Rate (lbs/hr): 36.1
(Emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507, combined)

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 6997

MAGLC (ug/m3): 10,338

Physical changes to or in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the " Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s)to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

a. A description of the parameters changed(composition of materials, new pollutants emitted,

change in stack/exhaust parameters, etc.);

b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. When the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

## IV. Reporting Requirements

None

## V. Testing Requirements

None

## VI. Miscellaneous Requirements

None

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

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

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

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | |
|---|---|---|
| P496 - Drais Mill 2 DR, equipment ID 34-10-101S | OAC rule 3745-31-05 (A)(3) | OAC rule 3745-17-08(B) |
| | | OAC rule 3745-17-07(B)(1) |
| | OAC rule 3745-31-05 (D) | |

| Applicable Emissions Limitations/Control Measures | |
|---|---|
| Particulate matter-particulate matter less than 10 microns (PM-PM10) emissions shall not exceed 0.07 pound (lb)/hour (hr*) and 0.30 ton per year ( TPY); volatile organic compound (VOC) emissions shall not exceed 2.35 lb VOC/hr* and 10.28 TPY.<br><br>See Term A.2.a<br><br>*The hourly emissions limitation is based on the maximum capacity of the equipment and thus, no hourly record keeping is required.<br><br>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(B)(1), 3745-17-08(B), and 3745-31-05(D). | rolling, 12-month summation<br><br>See Terms A.2.b and A.2.c<br><br>The permittee shall unload all solid materials in a manner to minimize or eliminate visible particulate emissions.<br><br>Visible particulate emissions shall not exceed 20% opacity, as a three- minute average, except as specified by rule. |
| VOC emissions shall not exceed 39.9 TPY based on a | |

**2. Addition Terms and Conditions**

**2.a** Compliance with OAC rule 3745-31-05(A)(3) (BAT) shall be demonstrated by the use of a building enclosure for control of particulate emissions, VOC input limitations and compliance with the Ohio Air Toxics Policy.

**2.b** The total combined emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation and the permittee will use existing records along with records required in this permit to demonstrate compliance with this limit upon issuance of the permit.

**2.c** The total VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined shall not exceed 2660 tons per year based upon a rolling, 12-month summation of the VOC input.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the VOC input levels specified in the following table:

| Month(s) | Maximum Allowable VOC Input (Tons) |
|---|---|
| 1 | 444 |
| 1-2 | 888 |
| 1-3 | 1110 |
| 1-4 | 1332 |
| 1-5 | 1554 |
| 1-6 | 1776 |
| 1-7 | 1998 |
| 1-8 | 2220 |
| 1-9 | 2442 |
| 1-10 | 2660 |
| 1-11 | 2660 |
| 1-12 | 2660 |

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual VOC input limit shall be based upon a rolling, 12-month summation of the VOC input.

## II. Operational Restrictions

None

## III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month:

a. The identification of each batch made (product code).

b. The batch size, in pounds.

c. The total pigment content of each batch, in pounds.

d. The liquid volatile organic compound input for each batch, in pounds.

e. The individual organic HAP content of each batch, in pounds of individual HAP.

f. The total combined organic HAP content of each batch, in pounds of combined HAP [sum of all the individual organic HAP contents from (e)].

g. If any inorganic HAP materials are employed, the individual inorganic HAP content of each batch, in pounds of individual HAP.

h. If any inorganic HAP materials are employed, the total combined inorganic HAP content of each batch, in pounds of combined HAP [sum of all the individual inorganic HAP contents from (g)].

i. The liquid organic cleanup material employed, in pounds.

j. If any organic HAP containing cleanup materials are employed, the individual organic HAP content of each cleanup material, in ~~pounds~~ percent by weight of individual HAP.

k. If any organic HAP containing cleanup materials are employed, the total combined organic HAP content of each cleanup material, in ~~pounds~~ percent by weight of combined HAP [sum of all the individual organic HAP contents from (j)].

l. The total monthly emissions, in pounds, calculated as below:

Monthly~~OC~~ VOC emissions =
sum of [(d) * 0.015 lb VOC emissions/lb VOC input] for all batches made per month + (i).

Monthly single HAP emissions for each HAP =
sum of [(e) * 0.015 lb HAP emissions/lb HAP] for all batches made per month + sum of [(g) * 0.001 lb HAP emissions/lb HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of (i * j) for all liquid organic cleanup materials used.

Monthly total HAP emissions =
sum of [(f) * 0.015 lb HAP emissions/lb HAP ] for all batches made + sum of [(h) * 0.001 lb HAP emissions/lb HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of all (i * k) for all liquid organic cleanup materials used.

m. The rolling, 12-month summation of VOC emissions, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined calculated as below:

Rolling, 12-month summation of VOC emissions = (monthly VOC emissions from (l) + sum of monthly VOC emissions from previous 11 calendar months)/2000.

2. The permittee shall maintain monthly records of the following:

a. The total monthly VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined, in tons.

b. The rolling, 12-month summation of the VOC input, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined calculated as below:

Rolling, 12-month summation of VOC input = (monthly VOC input from (a) + sum of monthly VOC input from previous 11 calendar months)

Also during the first 12 calendar months of operation following issuance of this permit, the permittee shall record the cumulative VOC input for each calendar month.

c. The monthly single HAP emissions from all facility emissions units combined, in pounds, for each single HAP.

d. The rolling, 12-month summation of single HAP emissions, in tons, from all facility emission units combined calculated as below for each single HAP:

Rolling, 12-month summation of single HAP emissions = (monthly single HAP emissions from (c) + sum of monthly single HAP emissions from previous 11 calendar months)/2000

e. The monthly total HAPs (sum of all single HAPs) emissions from all facility emissions units

combined, in pounds.

f. The rolling, 12-month summation of total HAPs (sum of all single HAPs) emissions, in tons, from all facility emissions units combined calculated as below:

Rolling, 12-month summation of total HAPs (sum of all single HAPs) emissions = (monthly total HAPs emissions from (e) + sum of monthly total HAPs emissions from previous 11 calendar months)/2000.

3. The permittee shall collect and record the following information for the purpose of determining annual VOC emissions:

a. The identification of each batch made (product code).

b. The batch size, in pounds.

c. The liquid volatile organic compound input for each batch, in pounds.

d. The liquid volatile organic compound cleanup material employed, in pounds.

e. The total VOC emissions from all batches produced and cleanup materials employed, in pounds or tons.

## IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for VOC emissions and VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative VOC input levels.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month HAP emission limitations for the facility as set forth in term A.2.b. The permittee shall submit quarterly reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance.

3. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

4. The permittee shall submit annual reports which specify the total VOC ~~and PM-PM10~~ emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

## V. Testing Requirements

1. The permittee may determine the VOC content of materials based on formulation data, and may rely on volatile matter content data provided by material suppliers. In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR Part 60, Subpart A, Test Methods 24 or 24A shall be used unless the permittee can demonstrate to the satisfaction of the agency that the formulation data is correct.

2. Emission limitation:
Visible particulate emissions shall not exceed 20 percent opacity, as a 3-minute average, except as specified by rule.

Applicable Compliance Method:
Compliance with the visible particulate emission limitation shall be demonstrated by the methods outlined in 40 CFR Part 60, Appendix A, Method 9.

3. Emission limitation:
2.35 lbs. of VOC/hr

Applicable compliance method:
Compliance with the VOC emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.4-1 (5/83), Uncontrolled emission factors for paint and varnish manufacturing.

4. Emission limitation:
10.28 TPY of VOC

Applicable Compliance Method:
Compliance shall be determined based on record keeping in Term A.III.3.

5. Emission limitation:
39.9 TPY VOC, based upon a rolling, 12-month summation from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined and 9.9 TPY for single HAP and 24.9 TPY for combined HAPs (sum of all single HAPs) from the facility.

Applicable Compliance Method:
Compliance shall be determined based on record keeping in Terms A.III.1 and A.III.2.

6. Emission limitation

0.07 lb of PM-PM10/hr

Applicable compliance method:
Compliance with the particulate and PM-10 emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.7-1 (5/83), Emission factors for printing ink manufacturing.

7. Emission limitation
0.30 TPY of PM /PM10

Applicable compliance method:
Compliance with the particulate and PM-10 emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.7-1 (5/83), Emission factors for printing ink manufacturing, multiplied by the sum of all pigment usage totals in term A.III.1.c.

8. Compliance with the VOC input limit in term A.I.2.c shall be determined by the record keeping in term A.III.2.

## VI. Miscellaneous Requirements

None

**B. State Only Enforceable Section**

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

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

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| P496 - Drais Mill 2 DR, equipment ID 34-10-101S | | |

**2. Additional Terms and Conditions**

**2.a** None

**II. Operational Restrictions**

None

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

1. The permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Xylene

TLV (ug/m3): 434,192

Maximum Hourly Emission Rate (lbs/hr): 36.1
(Emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507, combined)

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 6997

MAGLC (ug/m3): 10,338

Physical changes to or in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the " Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s)to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

a. A description of the parameters changed(composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. When the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

## IV. Reporting Requirements

None

## V. Testing Requirements

None

## VI. Miscellaneous Requirements

None

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

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

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

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | |
|---|---|---|
| | | OAC rule 3745-17-08(B) |
| P497 - Drais Mill 3 DR, equipment ID 34-12-102S | OAC rule 3745-31-05 (A)(3) | |
| | | OAC rule 3745-17-07(B)(1) |
| | OAC rule 3745-31-05 (D) | |

| Applicable Emissions Limitations/Control Measures | |
|---|---|
| Particulate matter-particulate matter less than 10 microns (PM-PM10) emissions shall not exceed 0.10 pound (lb)/hour (hr*) and 0.45 ton per year (TPY); volatile organic compound (VOC) emissions shall not exceed 3.52 lbs/hr* and 15.42 TPY.<br><br>See Term A.2.a<br><br>*The hourly emissions limitation is based on the maximum capacity of the equipment and thus, no hourly record keeping is required.<br><br>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(B)(1),3745-17-08(B), and 3745-31-05(D).<br><br>VOC emissions shall not exceed 39.9 TPY based on a rolling, 12-month summation<br><br>See Terms A.2.b and A.2.c | The permittee shall unload all solid materials in a manner to minimize or eliminate visible particulate emissions.<br><br>Visible particulate emissions shall not exceed 20% opacity, as a three- minute average, except as specified by rule. |

**2. Additional Terms and Conditions**

**2.a** Compliance with OAC rule 3745-31-05(A)(3) (BAT) shall be demonstrated by the use of a building enclosure for control of particulate emissions, VOC input limitations and compliance with the Ohio Air Toxics Policy.

**2.b** The total combined emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation and the permittee will use existing records along with records required in this permit to demonstrate compliance with this limit upon issuance of the permit.

**2.c** The total VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined shall not exceed 2660 tons per year based upon a rolling, 12-month summation of the VOC input.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the VOC input levels specified in the following table:

| Month(s) | Maximum Allowable VOC Input (Tons) |
|---|---|
| 1 | 444 |
| 1-2 | 888 |
| 1-3 | 1110 |
| 1-4 | 1332 |
| 1-5 | 1554 |
| 1-6 | 1776 |
| 1-7 | 1998 |
| 1-8 | 2220 |
| 1-9 | 2442 |
| 1-10 | 2660 |
| 1-11 | 2660 |
| 1-12 | 2660 |

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual VOC input limit shall be based upon a rolling, 12-month summation of the VOC input.

## II. Operational Restrictions

None

## III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month:

a. The identification of each batch made (product code).

b. The batch size, in pounds.

c. The total pigment content of each batch, in pounds.

d. The liquid volatile organic compound input for each batch, in pounds.

e. The individual organic HAP content of each batch, in pounds of individual HAP.

f. The total combined organic HAP content of each batch, in pounds of combined HAP [sum of all the individual organic HAP contents from (e)].

g. If any inorganic HAP materials are employed, the individual inorganic HAP content of each batch, in pounds of individual HAP.

h. If any inorganic HAP materials are employed, the total combined inorganic HAP content of each batch, in pounds of combined HAP [sum of all the individual inorganic HAP contents from (g)].

i. The liquid organic cleanup material employed, in pounds.

j. If any organic HAP containing cleanup materials are employed, the individual organic HAP content of each cleanup material, in ~~pounds~~ percent by weight of individual HAP.

k. If any organic HAP containing cleanup materials are employed, the total combined organic HAP content of each cleanup material, in ~~pounds~~ percent by weight of combined HAP [sum of all the individual organic HAP contents from (j)].

l. The total monthly emissions, in pounds, calculated as below:

Monthly~~OC~~ VOC emissions =
sum of [(d) * 0.015 lb VOC emissions/lb VOC input] for all batches made per month + (i).

Monthly single HAP emissions for each HAP =
sum of [(e) * 0.015 lb HAP emissions/lb HAP] for all batches made per month + sum of [(g) * 0.001 lb HAP emissions/lb HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of (i * j) for all liquid organic cleanup materials used.

Monthly total HAP emissions =
sum of [(f) * 0.015 lb HAP emissions/lb HAP ] for all batches made + sum of [(h) * 0.001 lb HAP emissions/lb HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of all (i * k) for all liquid organic cleanup materials used.

m. The rolling, 12-month summation of VOC emissions, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined calculated as below:

Rolling, 12-month summation of VOC emissions = (monthly VOC emissions from (l) + sum of monthly VOC emissions from previous 11 calendar months)/2000.

2. The permittee shall maintain monthly records of the following:

a. The total monthly VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined, in tons.

b. The rolling, 12-month summation of the VOC input, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined calculated as below:

Rolling, 12-month summation of VOC input = (monthly VOC input from (a) + sum of monthly VOC input from previous 11 calendar months)

Also during the first 12 calendar months of operation following issuance of this permit, the permittee shall record the cumulative VOC input for each calendar month.

c. The monthly single HAP emissions from all facility emissions units combined, in pounds, for each single HAP.

d. The rolling, 12-month summation of single HAP emissions, in tons, from all facility emission units

combined calculated as below for each single HAP:

Rolling, 12-month summation of single HAP emissions = (monthly single HAP emissions from (c) + sum of monthly single HAP emissions from previous 11 calendar months)/2000.

e. The monthly total HAPs (sum of all single HAPs) emissions from all facility emissions units combined, in pounds.

f. The rolling, 12-month summation of total HAPs (sum of all single HAPs) emissions, in tons, from all facility emissions units combined calculated as below:

Rolling, 12-month summation of total HAPs (sum of all single HAPs) emissions = (monthly total HAPs emissions from (e) + sum of monthly total HAPs emissions from previous 11 calendar months)/2000.

3. The permittee shall collect and record the following information for the purpose of determining annual VOC emissions:

a. The identification of each batch made (product code).

b. The batch size, in pounds.

c. The liquid volatile organic compound input for each batch, in pounds.

d. The liquid volatile organic compound cleanup material employed, in pounds.

e. The total VOC emissions from all batches produced and cleanup materials employed, in pounds or tons.

## IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for VOC emissions and VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative VOC input levels.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month HAP emission limitations for the facility as set forth in term A.2.b. The permittee shall submit quarterly reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance.

3. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

4. The permittee shall submit annual reports which specify the total VOC ~~and PM-PM10~~ emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

## V. Testing Requirements

1. The permittee may determine the VOC content of materials based on formulation data, and may rely on volatile matter content data provided by material suppliers. In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR Part 60, Subpart A, Test Methods 24 or 24A shall be used unless the permittee can demonstrate to the satisfaction of the agency that the formulation data is correct.

2. Emission limitation:
Visible particulate emissions shall not exceed 20 percent opacity, as a 3-minute average, except as specified by rule.

Applicable Compliance Method:
Compliance with the visible particulate emission limitation shall be demonstrated by the methods outlined in 40 CFR Part 60, Appendix A, Method 9.

3. Emission limitation:
3.52 lbs. of VOC/hr

Applicable compliance method:
Compliance with the VOC emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.4-1 (5/83), Uncontrolled emission factors for paint and varnish manufacturing.

4. Emission limitation:
15.42 TPY of VOC

Applicable Compliance Method:
Compliance shall be determined based on record keeping in Term A.III.3.

5. Emission limitation:
39.9 TPY VOC, based upon a rolling, 12-month summation from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined and 9.9 TPY for single HAP and 24.9 TPY for combined HAPs (sum of all single HAPs) from the facility.

Applicable Compliance Method:
Compliance shall be determined based on record keeping in Terms A.III.1 and A.III.2.

6. Emission limitation
0.10 lb of PM/hr

Applicable compliance method:
Compliance with the particulate and PM-10 emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.7-1 (5/83), Emission factors for printing ink manufacturing.

7. Emission limitation
0.45 TPY of PM/PM10

Applicable compliance method:
Compliance with the particulate and PM-10 emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.7-1 (5/83), Emission factors for printing ink manufacturing, multiplied by the sum of all pigment usage totals in term A.III.1.c.

8. Compliance with the VOC input limit in term A.I.2.c shall be determined by the record keeping in term A.III.2.

## VI. Miscellaneous Requirements

None

**B. State Only Enforceable Section**

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

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

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| P497 - Drais Mill 3 DR, equipment ID 34-12-102S | | |

**2. Additional Terms and Conditions**

**2.a** None

**II. Operational Restrictions**

None

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

1. The permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Xylene

TLV (ug/m3): 434,192

Maximum Hourly Emission Rate (lbs/hr): 36.1
(Emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507, combined)

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 6997

MAGLC (ug/m3): 10,338

Physical changes to or in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the " Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s)to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

a. A description of the parameters changed(composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. When the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

## IV. Reporting Requirements

None

## V. Testing Requirements

None

## VI. Miscellaneous Requirements

None

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

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

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

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | |
|---|---|---|
| P498 - Drais Mill 4 DR, equipment ID 34-12-110S | OAC rule 3745-31-05 (A)(3) | OAC rule 3745-17-08(B) |
| | | OAC rule 3745-17-07(B)(1) |
| | OAC rule 3745-31-05 (D) | |

| Applicable Emissions Limitations/Control Measures | |
|---|---|
| Particulate matter-particulate matter less than 10 microns (PM-PM10) emissions shall not exceed 0.14 pound (lb)/hour (hr*) and 0.60 ton per year (TPY); volatile organic compound (VOC) emissions shall not exceed 4.70 lb/hr*and 20.56 TPY.<br><br>See Term A.2.a<br><br>*The hourly emissions limitation is based on the maximum capacity of the equipment and thus, no hourly record keeping is required.<br><br>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(B)(1), 3745-17-08(B), and 3745-31-05(D).<br><br>VOC emissions shall not exceed 39.9 TPY based on a rolling, 12-month summation. | See Terms A.2.b and A.2.c<br><br>The permittee shall unload all solid materials in a manner to minimize or eliminate visible particulate emissions.<br>Visible particulate emissions shall not exceed 20% opacity, as a three-minute average, except as specified by rule. |

## 2. Additional Terms and Conditions

**2.a** Compliance with OAC rule 3745-31-05(A)(3) (BAT) shall be demonstrated by the use of a building enclosure for control of particulate emissions, VOC input limitations and compliance with the Ohio Air Toxics Policy.

**2.b** The total combined emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation and the permittee will use existing records along with records required in this permit to demonstrate compliance with this limit upon issuance of the permit.

**2.c** The total VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined shall not exceed 2660 tons per year based upon a rolling, 12-month summation of the VOC input.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the VOC input levels specified in the following table:

| Month(s) | Maximum Allowable VOC Input (Tons) |
|---|---|
| 1 | 444 |
| 1-2 | 888 |
| 1-3 | 1110 |
| 1-4 | 1332 |
| 1-5 | 1554 |
| 1-6 | 1776 |
| 1-7 | 1998 |
| 1-8 | 2220 |
| 1-9 | 2442 |
| 1-10 | 2660 |
| 1-11 | 2660 |
| 1-12 | 2660 |

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual VOC input limit shall be based upon a rolling, 12-month summation of the VOC input.

## II. Operational Restrictions

None

## III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month:

a. The identification of each batch made (product code).

b. The batch size, in pounds.

c. The total pigment content of each batch, in pounds.

d. The liquid volatile organic compound input for each batch, in pounds.

e. The individual organic HAP content of each batch, in pounds of individual HAP.

f. The total combined organic HAP content of each batch, in pounds of combined HAP [sum of all the individual organic HAP contents from (e)].

g. If any inorganic HAP materials are employed, the individual inorganic HAP content of each batch, in pounds of individual HAP.

h. If any inorganic HAP materials are employed, the total combined inorganic HAP content of each batch, in pounds of combined HAP [sum of all the individual inorganic HAP contents from (g)].

i. The liquid organic cleanup material employed, in pounds.

j. If any organic HAP containing cleanup materials are employed, the individual organic HAP content of each cleanup material, in ~~pounds~~ percent by weight of individual HAP.

k. If any organic HAP containing cleanup materials are employed, the total combined organic HAP content of each cleanup material, in ~~pounds~~ percent by weight of combined HAP [sum of all the individual organic HAP contents from (j)].

l. The total monthly emissions, in pounds, calculated as below:

Monthly~~OC~~ VOC emissions =
sum of [(d) * 0.015 lb VOC emissions/lb VOC input] for all batches made per month + (i).

Monthly single HAP emissions for each HAP =
sum of [(e) * 0.015 lb HAP emissions/lb HAP] for all batches made per month + sum of [(g) * 0.001 lb HAP emissions/lb HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of (i * j) for all liquid organic cleanup materials used.

Monthly total HAP emissions =
sum of [(f) * 0.015 lb HAP emissions/lb HAP ] for all batches made + sum of [(h) * 0.001 lb HAP emissions/lb HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of all (i * k) for all liquid organic cleanup materials used.

m. The rolling, 12-month summation of VOC emissions, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined calculated as below:

Rolling, 12-month summation of VOC emissions = (monthly VOC emissions from (l) + sum of monthly VOC emissions from previous 11 calendar months)/2000.

2. The permittee shall maintain monthly records of the following:

a. The total monthly VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined, in tons.

b. The rolling, 12-month summation of the VOC input, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined calculated as below:

Rolling, 12-month summation of VOC input = (monthly VOC input from (a) + sum of monthly VOC input from previous 11 calendar months)

Also during the first 12 calendar months of operation following issuance of this permit, the permittee shall record the cumulative VOC input for each calendar month.

c. The monthly single HAP emissions from all facility emissions units combined, in pounds, for each single HAP.

d. The rolling, 12-month summation of single HAP emissions, in tons, from all facility emission units combined calculated as below for each single HAP:

Rolling, 12-month summation of single HAP emissions = (monthly single HAP emissions from (c) + sum of monthly single HAP emissions from previous 11 calendar months)/2000.

e. The monthly total HAPs (sum of all single HAPs) emissions from all facility emissions units

combined, in pounds.

f. The rolling, 12-month summation of total HAPs (sum of all single HAPs) emissions, in tons, from all facility emissions units combined calculated as below:

Rolling, 12-month summation of total HAPs (sum of all single HAPs) emissions = (monthly total HAPs emissions from (e) + sum of monthly total HAPs emissions from previous 11 calendar months)/2000.

3. The permittee shall collect and record the following information for the purpose of determining annual VOC emissions:

a. The identification of each batch made (product code).

b. The batch size, in pounds.

c. The liquid volatile organic compound input for each batch, in pounds.

d. The liquid volatile organic compound cleanup material employed, in pounds.

e. The total VOC emissions from all batches produced and cleanup materials employed, in pounds or tons.

**IV. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for VOC emissions and VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative VOC input levels.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month HAP emission limitations for the facility as set forth in term A.2.b. The permittee shall submit quarterly reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance.

3. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

4. The permittee shall submit annual reports which specify the total VOC ~~and PM-PM10~~ emissions

from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

## V. Testing Requirements

1. The permittee may determine the VOC content of materials based on formulation data, and may rely on volatile matter content data provided by material suppliers. In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR Part 60, Subpart A, Test Methods 24 or 24A shall be used unless the permittee can demonstrate to the satisfaction of the agency that the formulation data is correct.

2. Emission limitation:
Visible particulate emissions shall not exceed 20 percent opacity, as a 3-minute average, except as specified by rule.

Applicable Compliance Method:
Compliance with the visible particulate emission limitation shall be demonstrated by the methods outlined in 40 CFR Part 60, Appendix A, Method 9.

3. Emission limitation:
4.70 lbs. of VOC/hr

Applicable compliance method:
Compliance with the VOC emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.4-1 (5/83), Uncontrolled emission factors for paint and varnish manufacturing.

4. Emission limitation:
20.56 TPY of VOC

Applicable Compliance Method:
Compliance shall be determined based on record keeping in Term A.III.3.

5. Emission limitation:
39.9 TPY VOC, based upon a rolling, 12-month summation from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined and 9.9 TPY for single HAP and 24.9 TPY for combined HAPs (sum of all single HAPs) from the facility.

Applicable Compliance Method:
Compliance shall be determined based on record keeping in Terms A.III.1 and A.III.2.

6. Emission limitation
0.14 lb of PM/hr

Applicable compliance method:
Compliance with the particulate and PM-10 emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.7-1 (5/83), Emission factors for printing ink manufacturing.

7. Emission limitation
0.60 TPY of PM/PM10

Applicable compliance method:
Compliance with the particulate and PM-10 emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.7-1 (5/83), Emission factors for printing ink manufacturing, multiplied by the sum of all pigment usage totals in term A.III.1.c.

8. Compliance with the VOC input limit in term A.I.2.c shall be determined by the record keeping in term A.III.2.

## VI. Miscellaneous Requirements

None

**B. State Only Enforceable Section**

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

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

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| P498 - Drais Mill 4 DR, equipment ID 34-12-110S | | |

**2. Additional Terms and Conditions**

**2.a** None

**II. Operational Restrictions**

None

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

1. The permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Xylene

TLV (ug/m3): 434,192

Maximum Hourly Emission Rate (lbs/hr): 36.1
(Emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507, combined)

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 6997

MAGLC (ug/m3): 10,338

Physical changes to or in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the " Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s)to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

a. A description of the parameters changed(composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. When the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

## IV. Reporting Requirements

None

## V. Testing Requirements

None

## VI. Miscellaneous Requirements

None

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

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

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

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | |
|---|---|---|
| | | OAC rule 3745-17-11(B)(1) |
| P499 - Pony Mixer 1, with baghouse, equipment ~~ID 34-21-104M~~ ***ID 34-21-111M*** | OAC rule 3745-31-05 (A)(3) | |
| | | OAC rule 3745-17-07(A)(1) |
| | OAC rule 3745-31-05 (D) | |

| Applicable Emissions Limitations/Control Measures | |
|---|---|
| Particulate matter-particulate matter less than 10 microns (PM-PM10) emissions shall not exceed 0.01 pound (lb)/hour (hr*) and 0.05 ton per year (TPY); volatile organic compound (VOC) emissions shall not exceed 4.40 lb/hr* and 19.27TPY.<br><br>See Term A.2.a<br><br>*The hourly emissions limitation is based on the maximum capacity of the equipment and thus, no hourly record keeping is required.<br><br>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-31-05(D).<br><br>VOC emissions shall not exceed 39.9 TPY based on a rolling, 12-month summation. | See Terms A.2.b and A.2.c<br><br>The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).<br><br>Visible particulate emissions from any stack shall not exceed 20% opacity, as a six- minute average, except as specified by rule. |

**2. Additional Terms and Conditions**

**2.a** Compliance with OAC rule 3745-31-05(A)(3) (BAT) shall be demonstrated by the use of a baghouse for control of particulate emissions, use of covers for control of volatile organic compound emissions, VOC input limitations and compliance with the Ohio Air Toxics Policy.

**2.b** The total combined emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation and the permittee will use existing records along with records required in this permit to demonstrate compliance with this limit upon issuance of the permit.

**2.c** The total VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined shall not exceed 2660 tons per year based upon a rolling, 12-month summation of the VOC input.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the VOC input levels specified in the following table:

| Month(s) | Maximum Allowable VOC Input (Tons) |
|---|---|
| 1 | 444 |
| 1-2 | 888 |
| 1-3 | 1110 |
| 1-4 | 1332 |
| 1-5 | 1554 |
| 1-6 | 1776 |
| 1-7 | 1998 |
| 1-8 | 2220 |
| 1-9 | 2442 |
| 1-10 | 2660 |
| 1-11 | 2660 |
| 1-12 | 2660 |

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual VOC input limit shall be based upon a rolling, 12-month summation of the VOC input.

## II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range established either during the most recent emission test that demonstrated that the emissions unit was in compliance or by the manufacturer's written recommendation while the emissions unit is in operation.

2. The permittee shall not operate this emission unit without the use of a ~~tight fitting~~ lid designed using good manufacturing practices to minimize emissions.

## III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month:

a. The identification of each batch made (product code).

b. The batch size, in pounds.

c. The total pigment content of each batch, in pounds.

d. The liquid volatile organic compound input for each batch, in pounds.

e. The individual organic HAP content of each batch, in pounds of individual HAP.

f. The total combined organic HAP content of each batch, in pounds of combined HAP [sum of all the individual organic HAP contents from (e)].

g. If any inorganic HAP materials are employed, the individual inorganic HAP content of each batch, in pounds of individual HAP.

h. If any inorganic HAP materials are employed, the total combined inorganic HAP content of each batch, in pounds of combined HAP [sum of all the individual inorganic HAP contents from (g)].

i. The liquid organic cleanup material employed, in pounds.

j. If any organic HAP containing cleanup materials are employed, the individual organic HAP content of each cleanup material, in ~~pounds~~ percent by weight of individual HAP.

k. If any organic HAP containing cleanup materials are employed, the total combined organic HAP content of each cleanup material, in ~~pounds~~ percent by weight of combined HAP [sum of all the individual organic HAP contents from (j)].

l. The total monthly emissions, in pounds, calculated as below:

Monthly~~OC~~ VOC emissions =
sum of [(d) * 0.015 lb VOC emissions/lb VOC input] for all batches made per month + (i).

Monthly single HAP emissions for each HAP =
sum of [(e) * 0.015 lb HAP emissions/lb HAP] for all batches made per month + sum of [(g) * 0.001 lb HAP emissions/lb HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of (i * j) for all liquid organic cleanup materials used.

Monthly total HAP emissions =
sum of [(f) * 0.015 lb HAP emissions/lb HAP ] for all batches made + sum of [(h) * 0.001 lb HAP emissions/lb HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of all (i * k) for all liquid organic cleanup materials used.

m. The rolling, 12-month summation of VOC emissions, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined calculated as below:

Rolling, 12-month summation of VOC emissions = (monthly VOC emissions from (l) + sum of monthly VOC emissions from previous 11 calendar months)/2000.

2. The permittee shall maintain monthly records of the following:

a. The total monthly VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined, in tons.

b. The rolling, 12-month summation of the VOC input, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined calculated as below:

Rolling, 12-month summation of VOC input = (monthly VOC input from (a) + sum of monthly VOC input from previous 11 calendar months)

Also during the first 12 calendar months of operation following issuance of this permit, the permittee shall record the cumulative VOC input for each calendar month.

c. The monthly single HAP emissions from all facility emissions units combined, in pounds, for each single HAP.

d. The rolling, 12-month summation of single HAP emissions, in tons, from all facility emission units combined calculated as below for each single HAP:

Rolling, 12-month summation of single HAP emissions = (monthly single HAP emissions from (c) + sum of monthly single HAP emissions from previous 11 calendar months)/2000

e. The monthly total HAPs (sum of all single HAPs) emissions from all facility emissions units combined, in pounds.

f. The rolling, 12-month summation of total HAPs (sum of all single HAPs) emissions, in tons, from all facility emissions units combined calculated as below:

Rolling, 12-month summation of total HAPs (sum of all single HAPs) emissions = (monthly total HAPs emissions from (e) + sum of monthly total HAPs emissions from previous 11 calendar months)/2000.

3. The permittee shall collect and record the following information for the purpose of determining annual VOC emissions:

a. The identification of each batch made (product code).

b. The batch size, in pounds.

c. The liquid volatile organic compound input for each batch, in pounds.

d. The liquid volatile organic compound cleanup material employed, in pounds.

e. The total VOC emissions from all batches produced and cleanup materials employed, in pounds or tons.

4. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.

5. The permittee shall maintain a record indicating that a ~~tightly fitting~~ cover designed using good engineering **practices to minimize emissions** is used whenever this emissions unit is in operation.

## IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the

rolling, 12-month emission limitation for VOC emissions and VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative VOC input levels.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month HAP emission limitations for the facility as set forth in term A.2.b. The permittee shall submit quarterly reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance.

3. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in term A.II.1.

4. The permittee shall submit control measure deviation (excursion) reports that identify all periods of time when the emission unit was in operation without the use of a ~~tightly fitting~~ lid designed using good engineering practices to minimize emissions.

5. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

6. The permittee shall submit annual reports which specify the total VOC ~~and PM-PM10~~ emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

## V. Testing Requirements

1. The permittee may determine the VOC content of materials based on formulation data, and may rely on volatile matter content data provided by material suppliers. In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR Part 60, Subpart A, Test Methods 24 or 24A shall be used unless the permittee can demonstrate to the satisfaction of the agency that the formulation data is correct.

2. Emission limitation:

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

Applicable Compliance Method:

Compliance with the visible particulate emission limitation shall be demonstrated by the methods outlined

in 40 CFR Part 60, Appendix A, Method 9.

3. Emission limitation:
4.40 lbs. of VOC/hr

Applicable compliance method:
Compliance with the VOC emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.4-1 (5/83), Uncontrolled emission factors for paint and varnish manufacturing.

4. Emission limitation:
20.56 TPY of VOC

Applicable Compliance Method:
Compliance shall be determined based on record keeping in Term A.III.3.

5. Emission limitation:
39.9 TPY VOC, based upon a rolling, 12-month summation from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined and 9.9 TPY for single HAP and 24.9 TPY for combined HAPs (sum of all single HAPs) from the facility.

Applicable Compliance Method:
Compliance shall be determined based on record keeping in Terms A.III.1 and A.III.2.

6. Emission limitation
0.01 lb of PM-PM10/hr

Applicable compliance method:
Compliance with the particulate and PM-10 emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.7-1 (5/83), Emission factors for printing ink manufacturing, and a fabric filter control factor of 95 per cent control efficiency.

7. Emission limitation
0.05 TPY of PM/PM10

Applicable compliance method:
Compliance with the particulate and PM-10 emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.7-1 (5/83), Emission factors for printing ink manufacturing, multiplied by the sum of all pigment usage totals in term A.III.1.c. then multiplied by (1-.95)( fabric filter control efficiency).

8. Compliance with the VOC input limit in term A.I.2.c shall be determined by the record keeping in term A.III.2.

## VI. Miscellaneous Requirements

None

**B. State Only Enforceable Section**

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

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

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| P499 - Pony Mixer 1, with baghouse, equipment ~~ID 34-21-104M~~ ***ID 34-21-111M*** | | |

**2. Additional Terms and Conditions**

**2.a** None

**II. Operational Restrictions**

None

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

1. The permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Xylene

TLV (ug/m3): 434,192

Maximum Hourly Emission Rate (lbs/hr): 36.1
(Emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507, combined)

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 6997

MAGLC (ug/m3): 10,338

Physical changes to or in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the " Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s)to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

a. A description of the parameters changed(composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. When the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

## IV. Reporting Requirements

None

## V. Testing Requirements

None

## VI. Miscellaneous Requirements

None

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

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

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

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | |
|---|---|---|
| | | OAC rule 3745-17-08(B) |
| P500 - ~~Pony Mixer 2,~~ Double Post Mixer equipment ~~ID 34-12-108M~~ ***ID 34-12-107M*** | OAC rule 3745-31-05 (A)(3) | |
| | | OAC rule 3745-17-07(B)(1) |
| | OAC rule 3745-31-05 (D) | |

| Applicable Emissions Limitations/Control Measures | |
|---|---|
| Particulate matter-particulate matter less than 10 microns (PM-PM10) emissions shall not exceed 0.05 pound (lb)/hour (hr*) and 0.23 ton per year (TPY); volatile organic compound (VOC) emissions shall not exceed ~~2.2~~ 4.4 lb/hr* and ~~9.64~~ 19.27 TPY.<br><br>See Term A.2.a<br><br>*The hourly emissions limitation is based on the maximum capacity of the equipment and thus, no hourly record keeping is required.<br><br>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(B)(1), 3745-17-08(B), and 3745-31-05(D).<br><br>VOC emissions shall not exceed 39.9 TPY based on a rolling, 12-month summation | See Term A.2.b, and A.2.c.<br><br>The permittee shall unload all solid materials in a manner to minimize or eliminate visible particulate emissions.<br><br>Visible particulate emissions from this emissions unit shall not exceed 20% opacity, as a three- minute average, except as specified by rule. |

**2. Additional Terms and Conditions**

**2.a** Compliance with OAC rule 3745-31-05(A)(3) (BAT) shall be demonstrated by the use of a building enclosure for control of particulate emissions, use of covers for control of volatile organic compound emissions, VOC input limitations and compliance with the Ohio Air Toxics Policy.

**2.b** The total combined emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation and the permittee will use existing records along with records required in this permit to demonstrate compliance with this limit upon issuance of the permit.

**2.c** The total VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined shall not exceed 2660 tons per year based upon a rolling, 12-month summation of the VOC input.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the VOC input levels specified in the following table:

| Month(s) | Maximum Allowable VOC Input (Tons) |
|---|---|
| 1 | 444 |
| 1-2 | 888 |
| 1-3 | 1110 |
| 1-4 | 1332 |
| 1-5 | 1554 |
| 1-6 | 1776 |
| 1-7 | 1998 |
| 1-8 | 2220 |
| 1-9 | 2442 |
| 1-10 | 2660 |
| 1-11 | 2660 |
| 1-12 | 2660 |

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual VOC input limit shall be based upon a rolling, 12-month summation of the VOC input.

## II. Operational Restrictions

1. The permittee shall not operate this emission unit without the use of a ~~tight fitting~~ lid designed using good manufacturing practices to minimize emissions.

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

1. The permittee shall collect and record the following information each month:

a. The identification of each batch made (product code).

b. The batch size, in pounds.

c. The total pigment content of each batch, in pounds.

d. The liquid volatile organic compound input for each batch, in pounds.

e. The individual organic HAP content of each batch, in pounds of individual HAP.

f. The total combined organic HAP content of each batch, in pounds of combined HAP [sum of all the individual organic HAP contents from (e)].

g. If any inorganic HAP materials are employed, the individual inorganic HAP content of each batch, in pounds of individual HAP.

h. If any inorganic HAP materials are employed, the total combined inorganic HAP content of each batch, in pounds of combined HAP [sum of all the individual inorganic HAP contents from (g)].

i. The liquid organic cleanup material employed, in pounds.

j. If any organic HAP containing cleanup materials are employed, the individual organic HAP content of each cleanup material, in ~~pounds~~ percent by weight of individual HAP.

k. If any organic HAP containing cleanup materials are employed, the total combined organic HAP content of each cleanup material, in ~~pounds~~ percent by weight of combined HAP [sum of all the individual organic HAP contents from (j)].

l. The total monthly emissions, in pounds, calculated as below:

Monthly~~OC~~ VOC emissions =
sum of [(d) * 0.015 lb VOC emissions/lb VOC input] for all batches made per month + (i).

Monthly single HAP emissions for each HAP =
sum of [(e) * 0.015 lb HAP emissions/lb HAP] for all batches made per month + sum of [(g) * 0.001 lb HAP emissions/lb HAP * (1-0.95 control efficiency for baghouse)] for all batches made +

sum of (i * j) for all liquid organic cleanup materials used.

Monthly total HAP emissions =
sum of [(f) * 0.015 lb HAP emissions/lb HAP ] for all batches made + sum of [(h) * 0.001 lb HAP emissions/lb HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of all (i * k) for all liquid organic cleanup materials used.

m. The rolling, 12-month summation of VOC emissions, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined calculated as below:

Rolling, 12-month summation of VOC emissions = (monthly VOC emissions from (l) + sum of monthly VOC emissions from previous 11 calendar months)/2000.

2. The permittee shall maintain monthly records of the following:

a. The total monthly VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined, in tons.

b. The rolling, 12-month summation of the VOC input, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined calculated as below:

Rolling, 12-month summation of VOC input = (monthly VOC input from (a) + sum of monthly VOC input from previous 11 calendar months)

Also during the first 12 calendar months of operation following issuance of this permit, the permittee shall record the cumulative VOC input for each calendar month.

c. The monthly single HAP emissions from all facility emissions units combined, in pounds, for each single HAP.

d. The rolling, 12-month summation of single HAP emissions, in tons, from all facility emission units combined calculated as below for each single HAP:

Rolling, 12-month summation of single HAP emissions = (monthly single HAP emissions from (c) + sum of monthly single HAP emissions from previous 11 calendar months)/2000.

e. The monthly total HAPs (sum of all single HAPs) emissions from all facility emissions units combined, in pounds.

f. The rolling, 12-month summation of total HAPs (sum of all single HAPs) emissions, in tons, from all facility emissions units combined calculated as below:

Rolling, 12-month summation of total HAPs (sum of all single HAPs) emissions = (monthly total HAPs emissions from (e) + sum of monthly total HAPs emissions from previous 11 calendar months)/2000.

3. The permittee shall collect and record the following information for the purpose of determining annual VOC emissions:

a. The identification of each batch made (product code).

b. The batch size, in pounds.

c. The liquid volatile organic compound input for each batch, in pounds.

d. The liquid volatile organic compound cleanup material employed, in pounds.

e. The total VOC emissions from all batches produced and cleanup materials employed, in pounds or tons.

4. The permittee shall maintain a record indicating that a ~~tightly fitting~~ cover designed using good engineering **practices to minimize emissions** is used whenever this emissions unit is in operation.

## IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for VOC emissions and VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative VOC input levels.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month HAP emission limitations for the facility as set forth in term A.2.b. The permittee shall submit quarterly reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance.

3. The permittee shall submit control measure deviation (excursion) reports that identify all periods of time when the emission unit was in operation without the use of a ~~tightly fitting~~ lid designed using good engineering practices to minimize emissions.

4. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

5. The permittee shall submit annual reports which specify the total VOC ~~and PM-PM10~~ emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

## V. Testing Requirements

1. The permittee may determine the VOC content of materials based on formulation data, and may rely on volatile matter content data provided by material suppliers. In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR Part 60, Subpart A, Test Methods 24 or 24A shall be used unless the permittee can demonstrate to the satisfaction of the agency that the formulation data is correct.

2. Emission limitation:
Visible particulate emissions shall not exceed 20 percent opacity, as a 3-minute average, except as specified by rule.

Applicable Compliance Method:
Compliance with the visible particulate emission limitation shall be demonstrated by the methods outlined in 40 CFR Part 60, Appendix A, Method 9.

3. Emission limitation:
~~2.2~~ 4.4 lbs. of VOC/hr

Applicable compliance method:
Compliance with the VOC emissions limitations in term A.1 shall be determined by emissions factors from AP-42 6.4-1 (5/83), Uncontrolled emission factors for paint and varnish manufacturing.

4. Emission limitation:
~~9.64~~ 19.27 TPY of VOC

Applicable Compliance Method:
Compliance shall be determined based on record keeping in Term A.III.3.

5. Emission limitation:
39.9 TPY VOC, based upon a rolling, 12-month summation from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined and 9.9 TPY for single HAP and 24.9 TPY for combined HAPs (sum of all single HAPs) from the facility.

Applicable Compliance Method:
Compliance shall be determined based on record keeping in Terms A.III.1 and A.III.2.

6. Emission limitation
0.05 lb of PM-PM10/hr

Applicable compliance method:
Compliance with the particulate and PM-10 emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.7-1 (5/83), Emission factors for printing ink manufacturing.

7. Emission limitation
0.23 TPY of PM/PM10

Applicable compliance method:
Compliance with the particulate and PM-10 emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.7-1 (5/83), Emission factors for printing ink manufacturing, multiplied by the sum of all pigment usage totals in term A.III.1.c.

8. Compliance with the VOC input limit in term A.I.2.c shall be determined by the record keeping in term A.III.2.

## VI. Miscellaneous Requirements

None

**B. State Only Enforceable Section**

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

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

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| P500 - ~~Pony Mixer 2,~~ Double Post Mixer equipment ~~ID 34-12-108M~~ ***ID 34-12-107M*** | | |

**2. Additional Terms and Conditions**

**2.a** None

**II. Operational Restrictions**

None

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

1. The permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Xylene

TLV (ug/m3): 434,192

Maximum Hourly Emission Rate (lbs/hr): 36.1
(Emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507, combined)

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 6997

MAGLC (ug/m3): 10,338

Physical changes to or in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the " Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s)to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

a. A description of the parameters changed(composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. Documentation of its evaluation and determination that the changed emissions unit still satisfies

the "Air Toxic Policy"; and

c. When the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

## IV. Reporting Requirements

None

## V. Testing Requirements

None

## VI. Miscellaneous Requirements

None

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

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

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

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | |
|---|---|---|
| | | OAC rule 3745-17-08(B) |
| P501 - Pony Mixer 3, equipment ~~ID 34-12-106M~~ ***ID 34-12-111M*** | OAC rule 3745-31-05 (A)(3) | |
| | | OAC rule 3745-17-07(B)(1) |
| | OAC rule 3745-31-05 (D) | |

| Applicable Emissions Limitations/Control Measures | |
|---|---|
| Particulate matter-particulate matter less than 10 microns (PM-PM10) emissions shall not exceed 0.03 pound (lb)/hour (hr*) and 0.12 ton per year (TPY); volatile organic compound (VOC) emissions shall not exceed 4.40 lb /hr* and 19.27 TPY.<br><br>See Term A.2.a<br><br>*The hourly emissions limitation is based on the maximum capacity of the equipment and thus, no hourly record keeping is required.<br><br>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(B)(1), 3745-17-08(B), and 3745-31-05(D).<br><br>VOC emissions shall not exceed 39.9 TPY based on a rolling, 12-month summation.<br><br>See Terms A.2.b and A.2.c<br><br>The permittee shall unload all solid materials in a manner | to minimize or eliminate visible particulate emissions.<br><br>Visible particulate emissions shall not exceed 20% opacity, as a three- minute average, except as specified by rule. |

**2. Additional Terms and Conditions**

**2.a** Compliance with OAC rule 3745-31-05(A)(3) (BAT) shall be demonstrated by the use of a building enclosure for control of particulate emissions, use of covers for control of volatile organic compound emissions, VOC input limitations and compliance with the Ohio Air Toxics Policy.

**2.b** The total combined emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation and the permittee will use existing records along with records required in this permit to demonstrate compliance with this limit upon issuance of the permit.

**2.c** The total VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined shall not exceed 2660 tons per year based upon a rolling, 12-month summation of the VOC input.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the VOC input levels specified in the following table:

| Month(s) | Maximum Allowable VOC Input (Tons) |
|---|---|
| 1 | 444 |
| 1-2 | 888 |
| 1-3 | 1110 |
| 1-4 | 1332 |
| 1-5 | 1554 |
| 1-6 | 1776 |
| 1-7 | 1998 |
| 1-8 | 2220 |
| 1-9 | 2442 |
| 1-10 | 2660 |
| 1-11 | 2660 |
| 1-12 | 2660 |

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual VOC input limit shall be based upon a rolling, 12-month summation of the VOC input.

## II. Operational Restrictions

1. The permittee shall not operate this emission unit without the use of a ~~tight fitting~~ lid designed using good manufacturing practices to minimize emissions.

## III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month:

a. The identification of each batch made (product code).

b. The batch size, in pounds.

c. The total pigment content of each batch, in pounds.

d. The liquid volatile organic compound input for each batch, in pounds.

e. The individual organic HAP content of each batch, in pounds of individual HAP.

f. The total combined organic HAP content of each batch, in pounds of combined HAP [sum of all the individual organic HAP contents from (e)].

g. If any inorganic HAP materials are employed, the individual inorganic HAP content of each batch, in pounds of individual HAP.

h. If any inorganic HAP materials are employed, the total combined inorganic HAP content of each batch, in pounds of combined HAP [sum of all the individual inorganic HAP contents from (g)].

i. The liquid organic cleanup material employed, in pounds.

j. If any organic HAP containing cleanup materials are employed, the individual organic HAP content of each cleanup material, in ~~pounds~~ percent by weight of individual HAP.

k. If any organic HAP containing cleanup materials are employed, the total combined organic HAP content of each cleanup material, in ~~pounds~~ percent by weight of combined HAP [sum of all the individual organic HAP contents from (j)].

l. The total monthly emissions, in pounds, calculated as below:

Monthly~~OC~~ VOC emissions =
sum of [(d) * 0.015 lb VOC emissions/lb VOC input] for all batches made per month + (i).

Monthly single HAP emissions for each HAP =
sum of [(e) * 0.015 lb HAP emissions/lb HAP] for all batches made per month + sum of [(g) * 0.001 lb HAP emissions/lb HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of (i * j) for all liquid organic cleanup materials used.

Monthly total HAP emissions =
sum of [(f) * 0.015 lb HAP emissions/lb HAP ] for all batches made + sum of [(h) * 0.001 lb HAP emissions/lb HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of all (i * k) for all liquid organic cleanup materials used.

m. The rolling, 12-month summation of VOC emissions, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined calculated as below:

Rolling, 12-month summation of VOC emissions = (monthly VOC emissions from (l) + sum of monthly VOC emissions from previous 11 calendar months)/2000.

2. The permittee shall maintain monthly records of the following:

a. The total monthly VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined, in tons.

b. The rolling, 12-month summation of the VOC input, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined calculated as below:

Rolling, 12-month summation of VOC input = (monthly VOC input from (a) + sum of monthly VOC input from previous 11 calendar months)

Also during the first 12 calendar months of operation following issuance of this permit, the permittee shall record the cumulative VOC input for each calendar month.

c. The monthly single HAP emissions from all facility emissions units combined, in pounds, for each single HAP.

d. The rolling, 12-month summation of single HAP emissions, in tons, from all facility emission units combined calculated as below for each single HAP:

Rolling, 12-month summation of single HAP emissions = (monthly single HAP emissions from (c) + sum of monthly single HAP emissions from previous 11 calendar months)/2000.

e. The monthly total HAPs (sum of all single HAPs) emissions from all facility emissions units combined, in pounds.

f. The rolling, 12-month summation of total HAPs (sum of all single HAPs) emissions, in tons, from all facility emissions units combined calculated as below:

Rolling, 12-month summation of total HAPs (sum of all single HAPs) emissions = (monthly total HAPs emissions from (e) + sum of monthly total HAPs emissions from previous 11 calendar months)/2000.

3. The permittee shall collect and record the following information for the purpose of determining annual VOC emissions:

a. The identification of each batch made (product code).

b. The batch size, in pounds.

c. The liquid volatile organic compound input for each batch, in pounds.

d. The liquid volatile organic compound cleanup material employed, in pounds.

e. The total VOC emissions from all batches produced and cleanup materials employed, in pounds or tons.

4. The permittee shall maintain a record indicating that a ~~tightly fitting~~ cover designed using good engineering **practices to minimize emissions** is used whenever this emissions unit is in operation.

## IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for VOC emissions and VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative VOC input levels.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month HAP emission limitations for the facility as set forth in term A.2.b. The permittee shall submit quarterly reports which identify all exceedances of these limitations, as

well as the corrective actions that were taken to achieve compliance.

3. The permittee shall submit control measure deviation (excursion) reports that identify all periods of time when the emission unit was in operation without the use of a ~~tightly fitting~~ lid designed using good engineering practices to minimize emissions.

4. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

5. The permittee shall submit annual reports which specify the total VOC ~~and PM-PM10~~ emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

## V. Testing Requirements

1. The permittee may determine the VOC content of materials based on formulation data, and may rely on volatile matter content data provided by material suppliers. In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR Part 60, Subpart A, Test Methods 24 or 24A shall be used unless the permittee can demonstrate to the satisfaction of the agency that the formulation data is correct.

2. Emission limitation:
Visible particulate emissions shall not exceed 20 percent opacity, as a 3-minute average, except as specified by rule.

Applicable Compliance Method:
Compliance with the visible particulate emission limitation shall be demonstrated by the methods outlined in 40 CFR Part 60, Appendix A, Method 9.

3. Emission limitation:
4.40 lbs. of VOC/hr

Applicable compliance method:
Compliance with the VOC emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.4-1 (5/83), Uncontrolled emission factors for paint and varnish manufacturing.

4. Emission limitation:
19.27 TPY of VOC

Applicable Compliance Method:
Compliance shall be determined based on record keeping in Term A.III.3.

5. Emission limitation:
39.9 TPY VOC, based upon a rolling, 12-month summation from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined and 9.9

TPY for single HAP and 24.9 TPY for combined HAPs (sum of all single HAPs) from the facility.

Applicable Compliance Method:
Compliance shall be determined based on record keeping in Terms A.III.1 and A.III.2.

6. Emission limitation
0.03 lb of PM-PM10/hr

Applicable compliance method:
Compliance with the particulate and PM-10 emissions limitations in term A.1 shall be determined by emissions factors from AP-42 6.7-1 (5/83), Emission factors for printing ink manufacturing.

7. Emission limitation
0.12 TPY of PM/PM10

Applicable compliance method:
Compliance with the particulate and PM-10 emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.7-1 (5/83), Emission factors for printing ink manufacturing, multiplied by the sum of all pigment usage totals in term A.III.1.c.

8. Compliance with the VOC input limit in term A.I.2.c shall be determined by the record keeping in term A.III.2.

## VI. Miscellaneous Requirements

None

**B. State Only Enforceable Section**

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

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

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| P501 - Pony Mixer 3, equipment ~~ID 34-12-106M~~ ***ID 34-12-111M*** | | |

**2. Additional Terms and Conditions**

**2.a** None

**II. Operational Restrictions**

None

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

1. The permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Xylene

TLV (ug/m3): 434,192

Maximum Hourly Emission Rate (lbs/hr): 36.1
(Emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507, combined)

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 6997

MAGLC (ug/m3): 10,338

Physical changes to or in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the " Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s)to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

a. A description of the parameters changed(composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. When the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

## IV. Reporting Requirements

None

## V. Testing Requirements

None

## VI. Miscellaneous Requirements

None

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

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

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

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | |
|---|---|---|
| P502 - Roll Mill 1, equipment ID 34-21-110S | OAC rule 3745-31-05 (A)(3) | OAC rule 3745-17-08(B) |
| | | OAC rule 3745-17-07(B)(1) |
| | OAC rule 3745-31-05 (D) | |

| Applicable Emissions Limitations/Control Measures | |
|---|---|
| Particulate matter-particulate matter less than 10 microns (PM-PM10) emissions shall not exceed 0.03 pound (lb)/hour (hr*) and 0.12 ton per year (TPY ); volatile organic compound (VOC) emissions shall not exceed 4.40 lb VOC/hr* and 19.27 TPY.<br><br>See Term A.2.a<br><br>*The hourly emissions limitation is based on the maximum capacity of the equipment and thus, no hourly record keeping is required.<br><br>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(B)(1), 3745-17-08(B), and 3745-31-05(D). | rolling, 12-month summation<br><br>See Terms A.2.b and A.2.c<br><br>The permittee shall unload all solid materials in a manner to minimize or eliminate visible particulate emissions.<br><br>Visible particulate emissions shall not exceed 20% opacity, as a three-minute average, except as specified by rule. |
| VOC emissions shall not exceed 39.9 TPY based on a | |

**2. Additional Terms and Conditions**

**2.a** Compliance with OAC rule 3745-31-05(A)(3) (BAT) shall be demonstrated by the use of a building enclosure for control of particulate emissions, VOC input limitations and compliance with the Ohio Air Toxics Policy.

**2.b** The total combined emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation and the permittee will use existing records along with records required in this permit to demonstrate compliance with this limit upon issuance of the permit.

**2.c** The total VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined shall not exceed 2660 tons per year based upon a rolling, 12-month summation of the VOC input.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the VOC input levels specified in the following table:

| Month(s) | Maximum Allowable VOC Input (Tons) |
|---|---|
| 1 | 444 |
| 1-2 | 888 |
| 1-3 | 1110 |
| 1-4 | 1332 |
| 1-5 | 1554 |
| 1-6 | 1776 |
| 1-7 | 1998 |
| 1-8 | 2220 |
| 1-9 | 2442 |
| 1-10 | 2660 |
| 1-11 | 2660 |
| 1-12 | 2660 |

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual VOC input limit shall be based upon a rolling, 12-month summation of the VOC input.

## II. Operational Restrictions

None

## III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month:

a. The identification of each batch made (product code).

b. The batch size, in pounds.

c. The total pigment content of each batch, in pounds.

d. The liquid volatile organic compound input for each batch, in pounds.

e. The individual organic HAP content of each batch, in pounds of individual HAP.

f. The total combined organic HAP content of each batch, in pounds of combined HAP [sum of all the individual organic HAP contents from (e)].

g. If any inorganic HAP materials are employed, the individual inorganic HAP content of each batch, in pounds of individual HAP.

h. If any inorganic HAP materials are employed, the total combined inorganic HAP content of each batch, in pounds of combined HAP [sum of all the individual inorganic HAP contents from (g)].

i. The liquid organic cleanup material employed, in pounds.

j. If any organic HAP containing cleanup materials are employed, the individual organic HAP content of each cleanup material, in ~~pounds~~ percent by weight of individual HAP.

k. If any organic HAP containing cleanup materials are employed, the total combined organic HAP content of each cleanup material, in ~~pounds~~ percent by weight of combined HAP [sum of all the individual organic HAP contents from (j)].

l. The total monthly emissions, in pounds, calculated as below:

Monthly~~OC~~ ***VOC*** emissions =
sum of [(d) * 0.015 lb VOC emissions/lb VOC input] for all batches made per month + (i).

Monthly single HAP emissions for each HAP =
sum of [(e) * 0.015 lb HAP emissions/lb HAP] for all batches made per month + sum of [(g) * 0.001 lb HAP emissions/lb HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of (i * j) for all liquid organic cleanup materials used.

Monthly total HAP emissions =
sum of [(f) * 0.015 lb HAP emissions/lb HAP ] for all batches made + sum of [(h) * 0.001 lb HAP emissions/lb HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of all (i * k) for all liquid organic cleanup materials used.

m. The rolling, 12-month summation of VOC emissions, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined calculated as below:

Rolling, 12-month summation of VOC emissions = (monthly VOC emissions from (l) + sum of monthly VOC emissions from previous 11 calendar months)/2000.

2. The permittee shall maintain monthly records of the following:

a. The total monthly VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined, in tons.

b. The rolling, 12-month summation of the VOC input, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined calculated as below:

Rolling, 12-month summation of VOC input = (monthly VOC input from (a) + sum of monthly VOC input from previous 11 calendar months)

Also during the first 12 calendar months of operation following issuance of this permit, the permittee shall record the cumulative VOC input for each calendar month.

c. The monthly single HAP emissions from all facility emissions units combined, in pounds, for each single HAP.

d. The rolling, 12-month summation of single HAP emissions, in tons, from all facility emission units combined calculated as below for each single HAP:

Rolling, 12-month summation of single HAP emissions = (monthly single HAP emissions from (c) + sum of monthly single HAP emissions from previous 11 calendar months)/2000.

e. The monthly total HAPs (sum of all single HAPs) emissions from all facility emissions units

combined, in pounds.

f. The rolling, 12-month summation of total HAPs (sum of all single HAPs) emissions, in tons, from all facility emissions units combined calculated as below:

Rolling, 12-month summation of total HAPs (sum of all single HAPs) emissions = (monthly total HAPs emissions from (e) + sum of monthly total HAPs emissions from previous 11 calendar months)/2000.

3. The permittee shall collect and record the following information for the purpose of determining annual VOC emissions:

a. The identification of each batch made (product code).

b. The batch size, in pounds.

c. The liquid volatile organic compound input for each batch, in pounds.

d. The liquid volatile organic compound cleanup material employed, in pounds.

e. The total VOC emissions from all batches produced and cleanup materials employed, in pounds or tons.

## IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for VOC emissions and VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative VOC input levels.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month HAP emission limitations for the facility as set forth in term A.2.b. The permittee shall submit quarterly reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance.

3. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

4. The permittee shall submit annual reports which specify the total VOC ~~and PM-PM10~~ emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

## V. Testing Requirements

1. The permittee may determine the VOC content of materials based on formulation data, and may rely on volatile matter content data provided by material suppliers. In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR Part 60, Subpart A, Test Methods 24 or 24A shall be used unless the permittee can demonstrate to the satisfaction of the agency that the formulation data is correct.

2. Emission limitation:
Visible particulate emissions shall not exceed 20 percent opacity, as a 3-minute average, except as specified by rule.

Applicable Compliance Method:
Compliance with the visible particulate emission limitation shall be demonstrated by the methods outlined in 40 CFR Part 60, Appendix A, Method 9.

3. Emission limitation:
4.40 lbs. of VOC/hr

Applicable compliance method:
Compliance with the VOC emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.4-1 (5/83), Uncontrolled emission factors for paint and varnish manufacturing.

4. Emission limitation:
19.27 TPY of VOC

Applicable Compliance Method:
Compliance shall be determined based on record keeping in Term A.III.3.

5. Emission limitation:
39.9 TPY VOC, based upon a rolling, 12-month summation from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined and 9.9 TPY for single HAP and 24.9 TPY for combined HAPs (sum of all single HAPs) from the facility.

Applicable Compliance Method:
Compliance shall be determined based on record keeping in Terms A.III.1 and A.III.2.

6. Emission limitation
0.03 lb of PM/PM-10/hr

Applicable compliance method:

Compliance with the particulate and PM-10 emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.7-1 (5/83), Emission factors for printing ink manufacturing.

7. Emission limitation
0.12 TPY PM /PM10

Applicable compliance method:
Compliance with the particulate and PM-10 emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.7-1 (5/83), Emission factors for printing ink manufacturing, multiplied by the sum of all pigment usage totals in term A.III.1.c.

8. Compliance with the VOC input limit in term A.I.2.c shall be determined by the record keeping in term A.III.2.

## VI. Miscellaneous Requirements

None

**B. State Only Enforceable Section**

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

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

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| P502 - Roll Mill 1, equipment ID 34-21-110S | | |

**2. Additional Terms and Conditions**

**2.a** None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

1. The permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Xylene

TLV (ug/m3): 434,192

Maximum Hourly Emission Rate (lbs/hr): 36.1

(Emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507, combined)

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 6997

MAGLC (ug/m3): 10,338

Physical changes to or in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the " Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s)to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

a. A description of the parameters changed(composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. When the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

## V. Testing Requirements

None

## VI. Miscellaneous Requirements

None

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

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

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

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | OAC rule 3745-17-08(B) |
|---|---|---|
| P503 - Roll Mill 2, equipment ID not yet assigned | OAC rule 3745-31-05 (A)(3) | |
| | | OAC rule 3745-17-07(B)(1) |
| | OAC rule 3745-31-05 (D) | |

| Applicable Emissions Limitations/Control Measures | |
|---|---|
| Particulate matter-particulate matter less than 10 microns (PM-PM10) emissions shall not exceed 0.03 pound (lb)/hour (hr*) and 0.12 ton per year (TPY); volatile organic compound (VOC) emissions shall not exceed 4.40 lb/hr* and 19.27 TPY.<br><br>See Term A.2.a<br><br>*The hourly emissions limitation is based on the maximum capacity of the equipment and thus, no hourly record keeping is required.<br><br>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(B)(1), 3745-17-08(B), and 3745-31-05(D).<br><br>VOC emissions shall not exceed 39.9 TPY based on a rolling, 12-month summation. | See Terms A.2.b and A.2.c<br><br>The permittee shall unload all solid materials in a manner to minimize or eliminate visible particulate emissions.<br><br>Visible particulate emissions shall not exceed 20% opacity, as a three- minute average, except as specified by rule. |

**2. Additional Terms and Conditions**

**2.a** Compliance with OAC rule 3745-31-05(A)(3) (BAT) shall be demonstrated by the use of a building enclosure for control of particulate emissions, VOC input limitations and compliance with the Ohio Air Toxics Policy.

**2.b** The total combined emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation and the permittee will use existing records along with records required in this permit to demonstrate compliance with this limit upon issuance of the permit.

**2.c** The total VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined shall not exceed 2660 tons per year based upon a rolling, 12-month summation of the VOC input.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the VOC input levels specified in the following table:

| Month(s) | Maximum Allowable VOC Input (Tons) |
|---|---|
| 1 | 444 |
| 1-2 | 888 |
| 1-3 | 1110 |
| 1-4 | 1332 |
| 1-5 | 1554 |
| 1-6 | 1776 |
| 1-7 | 1998 |
| 1-8 | 2220 |
| 1-9 | 2442 |
| 1-10 | 2660 |
| 1-11 | 2660 |
| 1-12 | 2660 |

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual VOC input limit shall be based upon a rolling, 12-month summation of the VOC input.

## II. Operational Restrictions

None

## III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month:

a. The identification of each batch made (product code).

b. The batch size, in pounds.

c. The total pigment content of each batch, in pounds.

d. The liquid volatile organic compound input for each batch, in pounds.

e. The individual organic HAP content of each batch, in pounds of individual HAP.

f. The total combined organic HAP content of each batch, in pounds of combined HAP [sum of all the individual organic HAP contents from (e)].

g. If any inorganic HAP materials are employed, the individual inorganic HAP content of each batch, in pounds of individual HAP.

h. If any inorganic HAP materials are employed, the total combined inorganic HAP content of each batch, in pounds of combined HAP [sum of all the individual inorganic HAP contents from (g)].

i. The liquid organic cleanup material employed, in pounds.

j. If any organic HAP containing cleanup materials are employed, the individual organic HAP content of each cleanup material, in ~~pounds~~ percent by weight of individual HAP.

k. If any organic HAP containing cleanup materials are employed, the total combined organic HAP content of each cleanup material, in ~~pounds~~ percent by weight of combined HAP [sum of all the individual organic HAP contents from (j)].

l. The total monthly emissions, in pounds, calculated as below:

Monthly~~OC~~ VOC emissions =
sum of [(d) * 0.015 lb VOC emissions/lb VOC input] for all batches made per month + (i).

Monthly single HAP emissions for each HAP =
sum of [(e) * 0.015 lb HAP emissions/lb HAP] for all batches made per month + sum of [(g) * 0.001 lb HAP emissions/lb HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of (i * j) for all liquid organic cleanup materials used.

Monthly total HAP emissions =
sum of [(f) * 0.015 lb HAP emissions/lb HAP ] for all batches made + sum of [(h) * 0.001 lb HAP emissions/lb HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of all (i * k) for all liquid organic cleanup materials used.

m. The rolling, 12-month summation of VOC emissions, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined calculated as below:

Rolling, 12-month summation of VOC emissions = (monthly VOC emissions from (l) + sum of monthly VOC emissions from previous 11 calendar months)/2000.

2. The permittee shall maintain monthly records of the following:

a. The total monthly VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined, in tons.

b. The rolling, 12-month summation of the VOC input, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined calculated as below:

Rolling, 12-month summation of VOC input = (monthly VOC input from (a) + sum of monthly VOC input from previous 11 calendar months)

Also during the first 12 calendar months of operation following issuance of this permit, the permittee shall record the cumulative VOC input for each calendar month.

c. The monthly single HAP emissions from all facility emissions units combined, in pounds, for each single HAP.

d. The rolling, 12-month summation of single HAP emissions, in tons, from all facility emission units

combined calculated as below for each single HAP:

Rolling, 12-month summation of single HAP emissions = (monthly single HAP emissions from (c) + sum of monthly single HAP emissions from previous 11 calendar months)/2000

e. The monthly total HAPs (sum of all single HAPs) emissions from all facility emissions units combined, in pounds.

f. The rolling, 12-month summation of total HAPs (sum of all single HAPs) emissions, in tons, from all facility emissions units combined calculated as below:

Rolling, 12-month summation of total HAPs (sum of all single HAPs) emissions = (monthly total HAPs emissions from (e) + sum of monthly total HAPs emissions from previous 11 calendar months)/2000.

3. The permittee shall collect and record the following information for the purpose of determining annual VOC emissions:

a. The identification of each batch made (product code).

b. The batch size, in pounds.

c. The liquid volatile organic compound input for each batch, in pounds.

d. The liquid volatile organic compound cleanup material employed, in pounds.

e. The total VOC emissions from all batches produced and cleanup materials employed, in pounds or tons.

## IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for VOC emissions and VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative VOC input levels.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month HAP emission limitations for the facility as set forth in term A.2.b. The

permittee shall submit quarterly reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance.

3. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

4. The permittee shall submit annual reports which specify the total VOC ~~and PM-PM10~~ emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

## V. Testing Requirements

1. The permittee may determine the VOC content of materials based on formulation data, and may rely on volatile matter content data provided by material suppliers. In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR Part 60, Subpart A, Test Methods 24 or 24A shall be used unless the permittee can demonstrate to the satisfaction of the agency that the formulation data is correct.

2. Emission limitation:
   Visible particulate emissions shall not exceed 20 percent opacity, as a 3-minute average, except as specified by rule.

   Applicable Compliance Method:
   Compliance with the visible particulate emission limitation shall be demonstrated by the methods outlined in 40 CFR Part 60, Appendix A, Method 9.

3. Emission limitation:
   4.40 lbs. of VOC/hr

   Applicable compliance method:
   Compliance with the VOC emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.4-1 (5/83), Uncontrolled emission factors for paint and varnish manufacturing.

4. Emission limitation:
   19.27 TPY of VOC

   Applicable Compliance Method:
   Compliance shall be determined based on record keeping in Term A.III.3.

5. Emission limitation:
   39.9 TPY VOC, based upon a rolling, 12-month summation from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined and 9.9 TPY for single HAP and 24.9 TPY for combined HAPs (sum of all single HAPs) from the facility.

   Applicable Compliance Method:
   Compliance shall be determined based on record keeping in Terms A.III.1 and A.III.2.

6. Emission limitation
   0.03 lb of PM/PM-10/hr

Applicable compliance method:
Compliance with the particulate and PM-10 emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.7-1 (5/83), Emission factors for printing ink manufacturing.

7. Emission limitation
0.12 TPY PM /PM10

Applicable compliance method:
Compliance with the particulate and PM-10 emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.7-1 (5/83), Emission factors for printing ink manufacturing, multiplied by the sum of all pigment usage totals in term A.III.1.c.

8. Compliance with the VOC input limit in term A.I.2.c shall be determined by the record keeping in term A.III.2.

## VI. Miscellaneous Requirements

None

**B. State Only Enforceable Section**

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

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

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| P503 - Roll Mill 2, equipment ID not yet assigned | | |

**2. Additional Terms and Conditions**

**2.a** None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

1. The permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

   The following summarizes the results of the modeling for the "worst case" pollutant(s):

   Pollutant: Xylene

   TLV (ug/m3): 434,192

Maximum Hourly Emission Rate (lbs/hr): 36.1
(Emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507, combined)

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 6997

MAGLC (ug/m3): 10,338

Physical changes to or in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the " Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s)to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

a. A description of the parameters changed(composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. When the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

## V. Testing Requirements

None

## VI. Miscellaneous Requirements

None

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

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

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

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| P504 - Roll Mill 3, equipment ID 34-12-109S | OAC rule 3745-31-05 (A)(3) | Particulate matter-particulate matter less than 10 microns (PM-PM10) emissions shall not exceed 0.03 pound (lb)/hour (hr*) and 0.12 ton per year (TPY); volatile organic compound (VOC) emissions shall not exceed 4.40 lb/hr* and 19.27 TPY.<br><br>See Term A.2.a<br><br>*The hourly emissions limitation is based on the maximum capacity of the equipment and thus, no hourly record keeping is required.<br><br>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(B)(1), 3745-17-08(B), and rule 3745-31-05(D). |
| | OAC rule 3745-31-05 (D) | VOC emissions shall not exceed 39.9 TPY based on a rolling, 12-month summation.<br><br>See Terms A.2.b and A.2.c |
| | OAC rule 3745-17-08(B) | The permittee shall unload all solid materials in a manner to minimize or eliminate visible particulate emissions. |
| | OAC rule 3745-17-07(B)(1) | Visible particulate emissions shall not |

exceed 20% opacity, as a three- minute average, except as specified by rule.

**2. Additional Terms and Conditions**

**2.a** Compliance with OAC rule 3745-31-05(A)(3) (BAT) shall be demonstrated by the use of a building enclosure for control of particulate emissions, VOC input limitations and compliance with the Ohio Air Toxics Policy.

**2.b** The total combined emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation and the permittee will use existing records along with records required in this permit to demonstrate compliance with this limit upon issuance of the permit.

**2.c** The total VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined shall not exceed 2660 tons per year based upon a rolling, 12-month summation of the VOC input.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the VOC input levels specified in the following table:

| Month(s) | Maximum Allowable VOC Input (Tons) |
|---|---|
| 1 | 444 |
| 1-2 | 888 |
| 1-3 | 1110 |
| 1-4 | 1332 |
| 1-5 | 1554 |
| 1-6 | 1776 |
| 1-7 | 1998 |
| 1-8 | 2220 |
| 1-9 | 2442 |
| 1-10 | 2660 |
| 1-11 | 2660 |
| 1-12 | 2660 |

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual VOC input limit shall be based upon a rolling, 12-month summation of the VOC input.

## II. Operational Restrictions

None

## III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month:

   a. The identification of each batch made (product code).

   b. The batch size, in pounds.

   c. The total pigment content of each batch, in pounds.

   d. The liquid volatile organic compound input for each batch, in pounds.

   e. The individual organic HAP content of each batch, in pounds of individual HAP.

   f. The total combined organic HAP content of each batch, in pounds of combined HAP [sum of all the individual organic HAP contents from (e)].

   g. If any inorganic HAP materials are employed, the individual inorganic HAP content of each batch, in pounds of individual HAP.

   h. If any inorganic HAP materials are employed, the total combined inorganic HAP content of each batch, in pounds of combined HAP [sum of all the individual inorganic HAP contents from (g)].

   i. The liquid organic cleanup material employed, in pounds.

   j. If any organic HAP containing cleanup materials are employed, the individual organic HAP content of each cleanup material, in ~~pounds~~ percent by weight of individual HAP.

   k. If any organic HAP containing cleanup materials are employed, the total combined organic HAP content of each cleanup material, in ~~pounds~~ percent by weight of combined HAP

[sum of all the individual organic HAP contents from (j)].

l. The total monthly emissions, in pounds, calculated as below:

Monthly~~OC~~ VOC emissions =
sum of [(d) * 0.015 lb VOC emissions/lb VOC input] for all batches made per month + (i).

Monthly single HAP emissions for each HAP =
sum of [(e) * 0.015 lb HAP emissions/lb HAP] for all batches made per month + sum of [(g) * 0.001 lb HAP emissions/lb HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of (i * j) for all liquid organic cleanup materials used.

Monthly total HAP emissions =
sum of [(f) * 0.015 lb HAP emissions/lb HAP ] for all batches made + sum of [(h) * 0.001 lb HAP emissions/lb HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of all (i * k) for all liquid organic cleanup materials used.

m. The rolling, 12-month summation of VOC emissions, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined calculated as below:

Rolling, 12-month summation of VOC emissions = (monthly VOC emissions from (l) + sum of monthly VOC emissions from previous 11 calendar months)/2000.

2. The permittee shall maintain monthly records of the following:

a. The total monthly VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined, in tons.

b. The rolling, 12-month summation of the VOC input, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined calculated as below:

Rolling, 12-month summation of VOC input = (monthly VOC input from (a) + sum of monthly VOC input from previous 11 calendar months)

Also during the first 12 calendar months of operation following issuance of this permit, the permittee shall record the cumulative VOC input for each calendar month.

c. The monthly single HAP emissions from all facility emissions units combined, in pounds, for each single HAP.

d. The rolling, 12-month summation of single HAP emissions, in tons, from all facility emission units combined calculated as below for each single HAP:

Rolling, 12-month summation of single HAP emissions = (monthly single HAP emissions from (c) + sum of monthly single HAP emissions from previous 11 calendar months)/2000.

e. The monthly total HAPs (sum of all single HAPs) emissions from all facility emissions units combined, in pounds.

f. The rolling, 12-month summation of total HAPs (sum of all single HAPs) emissions, in tons, from all facility emissions units combined calculated as below:

Rolling, 12-month summation of total HAPs (sum of all single HAPs) emissions = (monthly total HAPs emissions from (e) + sum of monthly total HAPs emissions from previous 11 calendar months)/2000.

3. The permittee shall collect and record the following information for the purpose of determining annual VOC emissions:

a. The identification of each batch made (product code).

b. The batch size, in pounds.

c. The liquid volatile organic compound input for each batch, in pounds.

d. The liquid volatile organic compound cleanup material employed, in pounds.

e. The total VOC emissions from all batches produced and cleanup materials employed, in pounds or tons.

## IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for VOC emissions and VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative VOC input levels.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month HAP emission limitations for the facility as set forth in term A.2.b. The permittee shall submit quarterly reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance.

3. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

4. The permittee shall submit annual reports which specify the total VOC ~~and PM-PM10~~ emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

## V. Testing Requirements

1. The permittee may determine the VOC content of materials based on formulation data, and may rely on volatile matter content data provided by material suppliers. In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR Part 60, Subpart A, Test Methods 24 or 24A shall be used unless the permittee can demonstrate to the satisfaction of the agency that the formulation data is correct.

2. Emission limitation:
Visible particulate emissions shall not exceed 20 percent opacity, as a 3-minute average, except as specified by rule.

Applicable Compliance Method:
Compliance with the visible particulate emission limitation shall be demonstrated by the methods outlined in 40 CFR Part 60, Appendix A, Method 9.

3. Emission limitation:
4.40 lbs. of VOC/hr

Applicable compliance method:
Compliance with the VOC emissions limitations in term A.1 shall be determined by emissions factors from AP-42 6.4-1 (5/83), Uncontrolled emission factors for paint and varnish manufacturing.

4. Emission limitation:
19.27 TPY of VOC

Applicable Compliance Method:
Compliance shall be determined based on record keeping in Term A.III.3.

5. Emission limitation:
39.9 TPY VOC, based upon a rolling, 12-month summation from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492,

P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined and 9.9 TPY for single HAP and 24.9 TPY for combined HAPs (sum of all single HAPs) from the facility.

Applicable Compliance Method:
Compliance shall be determined based on record keeping in Terms A.III.1 and A.III.2.

6. Emission limitation
0.03 lb of PM/PM-10/hr

Applicable compliance method:
Compliance with the particulate and PM-10 emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.7-1 (5/83), Emission factors for printing ink manufacturing.

7. Emission limitation
0.12 TPY PM/PM10

Applicable compliance method:
Compliance with the particulate and PM-10 emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.7-1 (5/83), Emission factors for printing ink manufacturing, multiplied by the sum of all pigment usage totals in term A.III.1.c.

8. Compliance with the VOC input limit in term A.I.2.c shall be determined by the record keeping in term A.III.2.

## VI. Miscellaneous Requirements

None

**B. State Only Enforceable Section**

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

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

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| P504 - Roll Mill 3, equipment ID 34-12-109S | | |

**2. Additional Terms and Conditions**

**2.a** None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

1. The permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

   The following summarizes the results of the modeling for the "worst case" pollutant(s):

   Pollutant: Xylene

   TLV (ug/m3): 434,192

   Maximum Hourly Emission Rate (lbs/hr): 36.1

(Emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507, combined)

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 6997

MAGLC (ug/m3): 10,338

Physical changes to or in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the " Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s)to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

a. A description of the parameters changed(composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. When the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

## V. Testing Requirements

None

## VI. Miscellaneous Requirements

None

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

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

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

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | OAC rule 3745-17-08(B) |
|---|---|---|
| P505 - Roll Mill 4, equipment ID not yet assigned | OAC rule 3745-31-05 (A)(3) | |
| | | OAC rule 3745-17-07(B)(1) |
| | OAC rule 3745-31-05 (D) | |

| Applicable Emissions Limitations/Control Measures | |
|---|---|
| Particulate matter-particulate matter less than 10 microns (PM-PM10) emissions shall not exceed 0.03 pound (lb)/hour (hr*) and 0.12 ton per year (TPY); volatile organic compound (VOC) emissions shall not exceed 4.40 lb /hr* and 19.27 TPY.<br><br>See Term A.2.a<br><br>*The hourly emissions limitation is based on the maximum capacity of the equipment and thus, no hourly record keeping is required.<br><br>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(B)(1), 3745-17-08(B), and 3745-31-05(D).<br><br>VOC emissions shall not exceed 39.9 TPY based on a rolling, 12-month summation. | See Terms A.2.b and A.2.c<br><br>The permittee shall unload all solid materials in a manner to minimize or eliminate visible particulate emissions.<br><br>Visible particulate emissions shall not exceed 20% opacity, as a three-minute average, except as specified by rule. |

**2. Additional Terms and Conditions**

**2.a** Compliance with OAC rule 3745-31-05(A)(3) (BAT) shall be demonstrated by the use of a building enclosure for control of particulate emissions, VOC input limitations and compliance with the Ohio Air Toxics Policy.

**2.b** The total combined emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation and the permittee will use existing records along with records required in this permit to demonstrate compliance with this limit upon issuance of the permit.

**2.c** The total VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined shall not exceed 2660 tons per year based upon a rolling, 12-month summation of the VOC input.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the VOC input levels specified in the following table:

| Month(s) | Maximum Allowable VOC Input (Tons) |
|---|---|
| 1 | 444 |
| 1-2 | 888 |
| 1-3 | 1110 |
| 1-4 | 1332 |
| 1-5 | 1554 |
| 1-6 | 1776 |
| 1-7 | 1998 |
| 1-8 | 2220 |
| 1-9 | 2442 |
| 1-10 | 2660 |
| 1-11 | 2660 |
| 1-12 | 2660 |

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual VOC input limit shall be based upon a rolling, 12-month summation of the VOC input.

## II. Operational Restrictions

None

## III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month:

   a. The identification of each batch made (product code).

   b. The batch size, in pounds.

   c. The total pigment content of each batch, in pounds.

   d. The liquid volatile organic compound input for each batch, in pounds.

   e. The individual organic HAP content of each batch, in pounds of individual HAP.

   f. The total combined organic HAP content of each batch, in pounds of combined HAP [sum of all the individual organic HAP contents from (e)].

   g. If any inorganic HAP materials are employed, the individual inorganic HAP content of each batch, in pounds of individual HAP.

   h. If any inorganic HAP materials are employed, the total combined inorganic HAP content of each batch, in pounds of combined HAP [sum of all the individual inorganic HAP contents from (g)].

   i. The liquid organic cleanup material employed, in pounds.

   j. If any organic HAP containing cleanup materials are employed, the individual organic HAP content of each cleanup material, in ~~pounds~~ percent by weight of individual HAP.

   k. If any organic HAP containing cleanup materials are employed, the total combined organic HAP content of each cleanup material, in ~~pounds~~ percent by weight of combined HAP [sum of all the individual organic HAP contents from (j)].

   l. The total monthly emissions, in pounds, calculated as below:

Monthly~~OC~~ VOC emissions =
sum of [(d) * 0.015 lb VOC emissions/lb VOC input] for all batches made per month + (i).

Monthly single HAP emissions for each HAP =
sum of [(e) * 0.015 lb HAP emissions/lb HAP] for all batches made per month + sum of [(g) * 0.001 lb HAP emissions/lb HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of (i * j) for all liquid organic cleanup materials used.

Monthly total HAP emissions =
sum of [(f) * 0.015 lb HAP emissions/lb HAP ] for all batches made + sum of [(h) * 0.001 lb HAP emissions/lb HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of all (i * k) for all liquid organic cleanup materials used.

m. The rolling, 12-month summation of VOC emissions, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined calculated as below:

Rolling, 12-month summation of VOC emissions = (monthly VOC emissions from (l) + sum of monthly VOC emissions from previous 11 calendar months)/2000.

2. The permittee shall maintain monthly records of the following:

a. The total monthly VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined, in tons.

b. The rolling, 12-month summation of the VOC input, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined calculated as below:

Rolling, 12-month summation of VOC input = (monthly VOC input from (a) + sum of monthly VOC input from previous 11 calendar months)

Also during the first 12 calendar months of operation following issuance of this permit, the permittee shall record the cumulative VOC input for each calendar month.

c. The monthly single HAP emissions from all facility emissions units combined, in pounds, for each single HAP.

d. The rolling, 12-month summation of single HAP emissions, in tons, from all facility emission units combined calculated as below for each single HAP:

Rolling, 12-month summation of single HAP emissions = (monthly single HAP emissions from (c) + sum of monthly single HAP emissions from previous 11 calendar months)/2000.

e. The monthly total HAPs (sum of all single HAPs) emissions from all facility emissions units combined, in pounds.

f. The rolling, 12-month summation of total HAPs (sum of all single HAPs) emissions, in tons, from all facility emissions units combined calculated as below:

Rolling, 12-month summation of total HAPs (sum of all single HAPs) emissions = (monthly total HAPs emissions from (e) + sum of monthly total HAPs emissions from previous 11 calendar months)/2000.

3. The permittee shall collect and record the following information for the purpose of determining annual VOC emissions:

a. The identification of each batch made (product code).

b. The batch size, in pounds.

c. The liquid volatile organic compound input for each batch, in pounds.

d. The liquid volatile organic compound cleanup material employed, in pounds.

e. The total VOC emissions from all batches produced and cleanup materials employed, in pounds or tons.

## IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for VOC emissions and VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative VOC input levels.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month HAP emission limitations for the facility as set forth in term A.2.b. The permittee shall submit quarterly reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance.

3. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

4. The permittee shall submit annual reports which specify the total VOC ~~and PM-PM10~~ emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

## V. Testing Requirements

1. The permittee may determine the VOC content of materials based on formulation data, and may rely on volatile matter content data provided by material suppliers. In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR Part 60, Subpart A, Test Methods 24 or 24A shall be used unless the permittee can demonstrate to the satisfaction of the agency that the formulation data is correct.

2. Emission limitation:
   Visible particulate emissions shall not exceed 20 percent opacity, as a 3-minute average, except as specified by rule.

   Applicable Compliance Method:
   Compliance with the visible particulate emission limitation shall be demonstrated by the methods outlined in 40 CFR Part 60, Appendix A, Method 9.

3. Emission limitation:
   4.40 lbs. of VOC/hr

   Applicable compliance method:
   Compliance with the VOC emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.4-1 (5/83), Uncontrolled emission factors for paint and varnish manufacturing.

4. Emission limitation:
   19.27 TPY of VOC

   Applicable Compliance Method:
   Compliance shall be determined based on record keeping in Term A.III.3.

5. Emission limitation:
   39.9 TPY VOC, based upon a rolling, 12-month summation from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined and 9.9 TPY for single HAP and 24.9 TPY for combined HAPs (sum of all single HAPs) from the facility.

   Applicable Compliance Method:
   Compliance shall be determined based on record keeping in Terms A.III.1 and A.III.2.

6. Emission limitation
   0.03 lb of PM/PM-10/hr

Applicable compliance method:
Compliance with the particulate and PM-10 emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.7-1 (5/83), Emission factors for printing ink manufacturing.

7. Emission limitation
0.12 TPY of PM/PM10

Applicable compliance method:
Compliance with the particulate and PM-10 emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.7-1 (5/83), Emission factors for printing ink manufacturing, multiplied by the sum of all pigment usage totals in term A.III.1.c.

8. Compliance with the VOC input limit in term A.I.2.c shall be determined by the record keeping in term A.III.2.

## VI. Miscellaneous Requirements

None

**B. State Only Enforceable Section**

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

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

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| P505 - Roll Mill 4, equipment ID not yet assigned | | |

**2. Additional Terms and Conditions**

**2.a** None

**II. Operational Restrictions**

None

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

1. The permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

   The following summarizes the results of the modeling for the "worst case" pollutant(s):

   Pollutant: Xylene

   TLV (ug/m3): 434,192

   Maximum Hourly Emission Rate (lbs/hr): 36.1
   (Emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507, combined)

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 6997

MAGLC (ug/m3): 10,338

Physical changes to or in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the " Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s)to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

a. A description of the parameters changed(composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. When the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

## IV. Reporting Requirements

None

## V. Testing Requirements

None

## VI. Miscellaneous Requirements

None

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

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

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

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | |
|---|---|---|
| | | OAC rule 3745-17-08(B) |
| P506 - Roll Mill 5, equipment ID not yet assigned | OAC rule 3745-31-05 (A)(3) | |
| | | OAC rule 3745-17-07(B)(1) |
| | OAC rule 3745-31-05 (D) | |

| Applicable Emissions Limitations/Control Measures | |
|---|---|
| Particulate matter-particulate matter less than 10 microns (PM-PM10) emissions shall not exceed 0.05 pound (lb)/hour (hr*) and 0.23 ton per year (TPY); volatile organic compound (VOC) emissions shall not exceed 4.40 lb/hr* and 19.27 TPY.<br><br>See Term A.2.a<br><br>*The hourly emissions limitation is based on the maximum capacity of the equipment and thus, no hourly record keeping is required.<br><br>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(B)(1), 3745-17-08(B), and 3745-31-05(D).<br><br>VOC emissions shall not exceed 39.9 TPY based on a rolling, 12-month summation. | See Terms A.2.b and A.2.c<br><br>The permittee shall unload all solid materials in a manner to minimize or eliminate visible particulate emissions.<br><br>Visible particulate emissions shall not exceed 20% opacity, as a three-minute average, except as specified by rule. |

**2. Additional Terms and Conditions**

**2.a** Compliance with OAC rule 3745-31-05(A)(3) (BAT) shall be demonstrated by the use of a building enclosure for control of particulate emissions, VOC input limitations and compliance with the Ohio Air Toxics Policy.

**2.b** The total combined emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation and the permittee will use existing records along with records required in this permit to demonstrate compliance with this limit upon issuance of the permit.

**2.c** The total VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined shall not exceed 2660 tons per year based upon a rolling, 12-month summation of the VOC input.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the VOC input levels specified in the following table:

| Month(s) | Maximum Allowable VOC Input (Tons) |
|---|---|
| 1 | 444 |
| 1-2 | 888 |
| 1-3 | 1110 |
| 1-4 | 1332 |
| 1-5 | 1554 |
| 1-6 | 1776 |
| 1-7 | 1998 |
| 1-8 | 2220 |
| 1-9 | 2442 |
| 1-10 | 2660 |
| 1-11 | 2660 |
| 1-12 | 2660 |

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual VOC input limit shall be based upon a rolling, 12-month summation of the VOC input.

## II. Operational Restrictions

None

## III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month:

   a. The identification of each batch made (product code).

   b. The batch size, in pounds.

   c. The total pigment content of each batch, in pounds.

   d. The liquid volatile organic compound input for each batch, in pounds.

   e. The individual organic HAP content of each batch, in pounds of individual HAP.

   f. The total combined organic HAP content of each batch, in pounds of combined HAP [sum of all the individual organic HAP contents from (e)].

   g. If any inorganic HAP materials are employed, the individual inorganic HAP content of each batch, in pounds of individual HAP.

   h. If any inorganic HAP materials are employed, the total combined inorganic HAP content of each batch, in pounds of combined HAP [sum of all the individual inorganic HAP contents from (g)].

   i. The liquid organic cleanup material employed, in pounds.

   j. If any organic HAP containing cleanup materials are employed, the individual organic HAP content of each cleanup material, in ~~pounds~~ percent by weight of individual HAP.

   k. If any organic HAP containing cleanup materials are employed, the total combined organic HAP content of each cleanup material, in ~~pounds~~ percent by weight of combined HAP [sum of all the individual organic HAP contents from (j)].

   l. The total monthly emissions, in pounds, calculated as below:

Monthly~~OC~~ VOC emissions =
sum of [(d) * 0.015 lb VOC emissions/lb VOC input] for all batches made per month + (i).

Monthly single HAP emissions for each HAP =
sum of [(e) * 0.015 lb HAP emissions/lb HAP] for all batches made per month + sum of [(g) * 0.001 lb HAP emissions/lb HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of (i * j) for all liquid organic cleanup materials used.

Monthly total HAP emissions =
sum of [(f) * 0.015 lb HAP emissions/lb HAP ] for all batches made + sum of [(h) * 0.001 lb HAP emissions/lb HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of all (i * k) for all liquid organic cleanup materials used.

m. The rolling, 12-month summation of VOC emissions, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined calculated as below:

Rolling, 12-month summation of VOC emissions = (monthly VOC emissions from (l) + sum of monthly VOC emissions from previous 11 calendar months)/2000.

2. The permittee shall maintain monthly records of the following:

a. The total monthly VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined, in tons.

b. The rolling, 12-month summation of the VOC input, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined calculated as below:

Rolling, 12-month summation of VOC input = (monthly VOC input from (a) + sum of monthly VOC input from previous 11 calendar months)

Also during the first 12 calendar months of operation following issuance of this permit, the permittee shall record the cumulative VOC input for each calendar month.

c. The monthly single HAP emissions from all facility emissions units combined, in pounds, for each single HAP.

d. The rolling, 12-month summation of single HAP emissions, in tons, from all facility

emission units combined calculated as below for each single HAP:

Rolling, 12-month summation of single HAP emissions = (monthly single HAP emissions from (c) + sum of monthly single HAP emissions from previous 11 calendar months)/2000.

e. The monthly total HAPs (sum of all single HAPs) emissions from all facility emissions units combined, in pounds.

f. The rolling, 12-month summation of total HAPs (sum of all single HAPs) emissions, in tons, from all facility emissions units combined calculated as below:

Rolling, 12-month summation of total HAPs (sum of all single HAPs) emissions = (monthly total HAPs emissions from (e) + sum of monthly total HAPs emissions from previous 11 calendar months)/2000.

3. The permittee shall collect and record the following information for the purpose of determining annual VOC emissions:

a. The identification of each batch made (product code).

b. The batch size, in pounds.

c. The liquid volatile organic compound input for each batch, in pounds.

d. The liquid volatile organic compound cleanup material employed, in pounds.

e. The total VOC emissions from all batches produced and cleanup materials employed, in pounds or tons.

## IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for VOC emissions and VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative VOC input levels.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the

rolling, 12-month HAP emission limitations for the facility as set forth in term A.2.b. The permittee shall submit quarterly reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance.

3. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

4. The permittee shall submit annual reports which specify the total VOC ~~and PM-PM10~~ emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

## V. Testing Requirements

1. The permittee may determine the VOC content of materials based on formulation data, and may rely on volatile matter content data provided by material suppliers. In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR Part 60, Subpart A, Test Methods 24 or 24A shall be used unless the permittee can demonstrate to the satisfaction of the agency that the formulation data is correct.

2. Emission limitation:
   Visible particulate emissions shall not exceed 20 percent opacity, as a 3-minute average, except as specified by rule.

   Applicable Compliance Method:
   Compliance with the visible particulate emission limitation shall be demonstrated by the methods outlined in 40 CFR Part 60, Appendix A, Method 9.

3. Emission limitation:
   4.40 lbs. of VOC/hr

   Applicable compliance method:
   Compliance with the VOC emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.4-1 (5/83), Uncontrolled emission factors for paint and varnish manufacturing.

4. Emission limitation:
   19.27 TPY of VOC

   Applicable Compliance Method:
   Compliance shall be determined based on record keeping in Term A.III.3.

5. Emission limitation:
   39.9 TPY VOC, based upon a rolling, 12-month summation from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined and 9.9 TPY for single HAP and 24.9 TPY for combined HAPs (sum of all single HAPs) from the facility.

   Applicable Compliance Method:
   Compliance shall be determined based on record keeping in Terms A.III.1 and A.III.2.

6. Emission limitation
   0.05 lb of PM/PM-10 /hr

Applicable compliance method:
Compliance with the particulate and PM-10 emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.7-1 (5/83), Emission factors for printing ink manufacturing.

7. Emission limitation
0.23 TPY of PM/PM10

Applicable compliance method:
Compliance with the particulate and PM-10 emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.7-1 (5/83), Emission factors for printing ink manufacturing, multiplied by the sum of all pigment usage totals in term A.III.1.c.

8. Compliance with the VOC input limit in term A.I.2.c shall be determined by the record keeping in term A.III.2.

## VI. Miscellaneous Requirements

None

**B. State Only Enforceable Section**

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

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

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| P506 - Roll Mill 5, equipment ID not yet assigned | | |

**2. Additional Terms and Conditions**

**2.a** None

**II. Operational Restrictions**

None

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

1. The permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

   The following summarizes the results of the modeling for the "worst case" pollutant(s):

   Pollutant: Xylene

   TLV (ug/m3): 434,192

   Maximum Hourly Emission Rate (lbs/hr): 36.1
   (Emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507, combined)

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 6997

MAGLC (ug/m3): 10,338

Physical changes to or in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the " Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s)to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

a. A description of the parameters changed(composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. When the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

## IV. Reporting Requirements

None

## V. Testing Requirements

None

## VI. Miscellaneous Requirements

None

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

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

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

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | |
|---|---|---|
| | | OAC rule 3745-17-08(B) |
| P507 - Roll Mill 6, equipment ~~ID not yet assigned~~ ***ID 34-21-109S*** | OAC rule 3745-31-05 (A)(3) | OAC rule 3745-17-07(B)(1) |
| | OAC rule 3745-31-05 (D) | |

| Applicable Emissions Limitations/Control Measures | |
|---|---|
| Particulate matter-particulate matter less than 10 microns (PM-PM10) emissions shall not exceed 0.05 pound (lb)/hour (hr*) and 0.23 ton per year (TPY); volatile organic compound (VOC) emissions shall not exceed 4.40 lb/hr* and 19.27 TPY.<br><br>See Term A.2.a<br><br>*The hourly emissions limitation is based on the maximum capacity of the equipment and thus, no hourly record keeping is required.<br><br>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(B)(1), 3745-17-08(B), and 3745-31-05(D).<br><br>VOC emissions shall not exceed 39.9 TPY based on a rolling, 12-month summation. | See Terms A.2.b and A.2.c<br><br>The permittee shall unload all solid materials in a manner to minimize or eliminate visible particulate emissions.<br><br>Visible particulate emissions shall not exceed 20% opacity, as a three-minute average, except as specified by rule. |

**2. Additional Terms and Conditions**

**2.a** Compliance with OAC rule 3745-31-05(A)(3) (BAT) shall be demonstrated by the use of a building enclosure for control of particulate emissions, VOC input limitations and compliance with the Ohio Air Toxics Policy.

**2.b** The total combined emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation and the permittee will use existing records along with records required in this permit to demonstrate compliance with this limit upon issuance of the permit.

**2.c** The total VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined shall not exceed 2660 tons per year based upon a rolling, 12-month summation of the VOC input.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the VOC input levels specified in the following table:

| Month(s) | Maximum Allowable VOC Input (Tons) |
|---|---|
| 1 | 444 |
| 1-2 | 888 |
| 1-3 | 1110 |
| 1-4 | 1332 |
| 1-5 | 1554 |
| 1-6 | 1776 |
| 1-7 | 1998 |
| 1-8 | 2220 |
| 1-9 | 2442 |
| 1-10 | 2660 |
| 1-11 | 2660 |
| 1-12 | 2660 |

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual VOC input limit shall be based upon a rolling, 12-month summation of the VOC input.

## II. Operational Restrictions

None

## III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month:

   a. The identification of each batch made (product code).

   b. The batch size, in pounds.

   c. The total pigment content of each batch, in pounds.

   d. The liquid volatile organic compound input for each batch, in pounds.

   e. The individual organic HAP content of each batch, in pounds of individual HAP.

   f. The total combined organic HAP content of each batch, in pounds of combined HAP [sum of all the individual organic HAP contents from (e)].

   g. If any inorganic HAP materials are employed, the individual inorganic HAP content of each batch, in pounds of individual HAP.

   h. If any inorganic HAP materials are employed, the total combined inorganic HAP content of each batch, in pounds of combined HAP [sum of all the individual inorganic HAP contents from (g)].

   i. The liquid organic cleanup material employed, in pounds.

   j. If any organic HAP containing cleanup materials are employed, the individual organic HAP content of each cleanup material, in percent by weight of individual HAP.

   k. If any organic HAP containing cleanup materials are employed, the total combined organic HAP content of each cleanup material, in percent by weight of combined HAP [sum of all the individual organic HAP contents from (j)].

l. The total monthly emissions, in pounds, calculated as below:

Monthly~~OC~~ VOC emissions =
sum of [(d) * 0.015 lb VOC emissions/lb VOC input] for all batches made per month + (i).

Monthly single HAP emissions for each HAP=
sum of [(e) * 0.015 lb HAP emissions/lb HAP] for all batches made per month + sum of [(g) * 0.001 lb HAP emissions/lb HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of (i * j) for all liquid organic cleanup materials used.
Monthly total HAP emissions =
sum of [(f) * 0.015 lb HAP emissions/lb HAP ] for all batches made + sum of [(h) * 0.001 lb HAP emissions/lb HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of all (i * k) for all liquid organic cleanup materials used.

m. The rolling, 12-month summation of VOC emissions, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined calculated as below:

Rolling, 12-month summation of VOC emissions = (monthly VOC emissions from (l) + sum of monthly VOC emissions from previous 11 calendar months)/2000.

2. The permittee shall maintain monthly records of the following:

a. The total monthly VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined, in tons.

b. The rolling, 12-month summation of the VOC input, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined calculated as below:

Rolling, 12-month summation of VOC input = (monthly VOC input from (a) + sum of monthly VOC input from previous 11 calendar months)

Also during the first 12 calendar months of operation following issuance of this permit, the permittee shall record the cumulative VOC input for each calendar month.

c. The monthly single HAP emissions from all facility emissions units combined, in pounds, for each single HAP.

d. The rolling, 12-month summation of single HAP emissions, in tons, from all facility

emission units combined calculated as below for each single HAP:

Rolling, 12-month summation of single HAP emissions = (monthly single HAP emissions from (c) + sum of monthly single HAP emissions from previous 11 calendar months)/2000.

e. The monthly total HAPs (sum of all single HAPs) emissions from all facility emissions units combined, in pounds.

f. The rolling, 12-month summation of total HAPs (sum of all single HAPs) emissions, in tons, from all facility emissions units combined calculated as below:

Rolling, 12-month summation of total HAPs (sum of all single HAPs) emissions = (monthly total HAPs emissions from (e) + sum of monthly total HAPs emissions from previous 11 calendar months)/2000.

3. The permittee shall collect and record the following information for the purpose of determining annual VOC emissions:

a. The identification of each batch made (product code).

b. The batch size, in pounds.

c. The liquid volatile organic compound input for each batch, in pounds.

d. The liquid volatile organic compound cleanup material employed, in pounds.

e. The total VOC emissions from all batches produced and cleanup materials employed, in pounds or tons.

## IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for VOC emissions and VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative VOC input levels.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the

rolling, 12-month HAP emission limitations for the facility as set forth in term A.2.b. The permittee shall submit quarterly reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance.

3. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

4. The permittee shall submit annual reports which specify the total VOC ~~and PM-PM10~~ emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

## V. Testing Requirements

1. The permittee may determine the VOC content of materials based on formulation data, and may rely on volatile matter content data provided by material suppliers. In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR Part 60, Subpart A, Test Methods 24 or 24A shall be used unless the permittee can demonstrate to the satisfaction of the agency that the formulation data is correct.

2. Emission limitation:
   Visible particulate emissions shall not exceed 20 percent opacity, as a 3-minute average, except as specified by rule.

   Applicable Compliance Method:
   Compliance with the visible particulate emission limitation shall be demonstrated by the methods outlined in 40 CFR Part 60, Appendix A, Method 9.

3. Emission limitation:
   4.40 lbs. of VOC/hr

   Applicable compliance method:
   Compliance with the VOC emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.4-1 (5/83), Uncontrolled emission factors for paint and varnish manufacturing.

4. Emission limitation:
   19.27 TPY of VOC

   Applicable Compliance Method:
   Compliance shall be determined based on record keeping in Term A.III.3.

5. Emission limitation:
   39.9 TPY VOC, based upon a rolling, 12-month summation from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507 combined and 9.9 TPY for single HAP and 24.9 TPY for combined HAPs (sum of all single HAPs) from the facility.

   Applicable Compliance Method:
   Compliance shall be determined based on record keeping in Terms A.III.1 and A.III.2.

6. Emission limitation
   0.05 lb PM/PM-10/hr

Applicable compliance method:
Compliance with the particulate and PM-10 emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.7-1 (5/83), Emission factors for printing ink manufacturing.

7. Emission limitation
0.23 TPY of PM /PM10

Applicable compliance method:
Compliance with the particulate and PM-10 emissions limitations in term A.1 shall be determined by emissions factors from AP-42, 6.7-1 (5/83), Emission factors for printing ink manufacturing, multiplied by the sum of all pigment usage totals in term A.III.1.c.

8. Compliance with the VOC input limit in term A.I.2.c shall be determined by the record keeping in term A.III.2.

## VI. Miscellaneous Requirements

None

**B. State Only Enforceable Section**

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

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

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| P507 - Roll Mill 6, equipment ~~ID not yet assigned~~ ***ID 34-21-109S*** | | |

**2. Additional Terms and Conditions**

**2.a** None

**II. Operational Restrictions**

None

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

1. The permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

   The following summarizes the results of the modeling for the "worst case" pollutant(s):

   Pollutant: Xylene

   TLV (ug/m3): 434,192

   Maximum Hourly Emission Rate (lbs/hr): 36.1
   (Emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P503, P504, P505, P506 and P507, combined)

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 6997

MAGLC (ug/m3): 10,338

Physical changes to or in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the " Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s)to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

a. A description of the parameters changed(composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. When the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

## IV. Reporting Requirements

None

## V. Testing Requirements

None

## VI. Miscellaneous Requirements

None

**NEW SOURCE REVIEW FORM B**

PTI Number: 14-05390 Facility ID: 1431070039

FACILITY NAME Noveon Hilton Davis

FACILITY DESCRIPTION Various emissions units to produce Milled/Dispersed Pigments; (8)ball mills, (11) high speed dispersers, (4) drais mills, (3) pony mixers, and (3) roll mills. CITY/TWP Cincinnati Ohio

SIC CODE 2865 SCC CODE 30102005 EMISSIONS UNIT ID P476

EMISSIONS UNIT DESCRIPTION Ball Mill A, equipment ID 34-21-104R

DATE INSTALLED 4/30/03

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

| Pollutants | Air Quality Description | Actual Emissions Rate | | PTI Allowable | |
|---|---|---|---|---|---|
| | | Short Term Rate | Tons Per Year | Short Term Rate | Tons Per Year |
| Particulate Matter | Attainment | 0.01 lb./hr | 0.05 TPY | 0.01 lb./hr | 0.05 TPY |
| $PM_{10}$ | Attainment | 0.01lb/hr | 0.05 TPY | 0.01lb/hr | 0.05 TPY |
| Sulfur Dioxide | Attainment | | | | |
| Organic Compounds | Non attainment | 1.73 lb/hr | 7.56 tpy | 1.73 lb/hr | 7.56 tpy |
| Nitrogen Oxides | Attainment | | | | |
| Carbon Monoxide | Attainment | | | | |
| Lead | Attainment | | | | |
| Other: Air Toxics | | | | | |

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

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

**Enter Determination** BAT satisfied by use of covers for VOC control, fabric filters for PM control, and compliance with Ohio Air Toxics Policy,

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? YES

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

**TOXIC AIR CONTAMINANTS**

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

AIR TOXICS MODELING PERFORMED*? X YES ____ NO

IDENTIFY THE AIR CONTAMINANTS: Xylene

**NEW SOURCE REVIEW FORM B**

PTI Number: 14-05390 Facility ID: 1431070039

FACILITY NAME Noveon Hilton Davis

FACILITY DESCRIPTION Various emissions units to produce CITY/TWP Cincinnati Ohio

Emissions Unit ID: P507

SIC CODE 2865 SCC CODE 30102005 EMISSIONS UNIT ID P477

EMISSIONS UNIT DESCRIPTION Ball Mill B, equipment ID 34-21-103R

DATE INSTALLED 4/30/03

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

| Pollutants | Air Quality Description | Actual Emissions Rate | | PTI Allowable | |
|---|---|---|---|---|---|
| | | Short Term Rate | Tons Per Year | Short Term Rate | Tons Per Year |
| Particulate Matter | Attainment | 0.01 lb./hr | 0.05 TPY | 0.01 lb./hr | 0.05 TPY |
| $PM_{10}$ | Attainment | 0.01 lb/hr | 0.05 TPY | 0.01lb/hr | 0.05 TPY |
| Sulfur Dioxide | Attainment | | | | |
| Organic Compounds | Non attainment | 1.73 lb/hr | 7.56 TPY | 1.73 lb/hr | 7.56 TPY |
| Nitrogen Oxides | Attainment | | | | |
| Carbon Monoxide | Attainment | | | | |
| Lead | Attainment | | | | |
| Other: Air Toxics | | | | | |

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

| WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION? |
|---|
| **Enter Determination** BAT satisfied by use of covers for VOC control, fabric filters for PM control, and compliance with Ohio Air Toxics Policy, |

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY?

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

**TOXIC AIR CONTAMINANTS**

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

AIR TOXICS MODELING PERFORMED*? X YES ____ NO

IDENTIFY THE AIR CONTAMINANTS: Xylene

**NEW SOURCE REVIEW FORM B**

PTI Number: 14-05390 Facility ID: 1431070039

FACILITY NAME Noveon Hilton Davis

FACILITY DESCRIPTION Various emissions units to produce CITY/TWP Cincinnati Ohio

Emissions Unit ID: P507

SIC CODE 2865 SCC CODE 30102005 EMISSIONS UNIT ID P478

EMISSIONS UNIT DESCRIPTION Ball Mill C, equipment ID 34-21-107R

DATE INSTALLED 4/30/03

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

| Pollutants | Air Quality Description | Actual Emissions Rate | | PTI Allowable | |
|---|---|---|---|---|---|
| | | Short Term Rate | Tons Per Year | Short Term Rate | Tons Per Year |
| Particulate Matter | Attainment | 0.01 lb./hr | 0.01 TPY | 0.01 lb./hr | 0.01 TPY |
| $PM_{10}$ | Attainment | 0.01 lb/hr | 0.01 TPY | 0.01lb/hr | 0.01 TPY |
| Sulfur Dioxide | Attainment | | | | |
| Organic Compounds | Non attainment | 0.47 lb/hr | 2.08 TPY | 0.47 lb/hr | 2.08 TPY |
| Nitrogen Oxides | Attainment | | | | |
| Carbon Monoxide | Attainment | | | | |
| Lead | Attainment | | | | |
| Other: Air Toxics | | | | | |

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

| WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION? |
|---|
| **Enter Determination** BAT satisfied by use of covers for VOC control, fabric filters for PM control, and compliance with Ohio Air Toxics Policy |

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY?

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

**TOXIC AIR CONTAMINANTS**

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

AIR TOXICS MODELING PERFORMED*? YES NO

IDENTIFY THE AIR CONTAMINANTS:

**NEW SOURCE REVIEW FORM B**

PTI Number: 14-05390 Facility ID: 1431070039

FACILITY NAME Noveon Hilton Davis

FACILITY DESCRIPTION Various emissions units to produce CITY/TWP Cincinnati Ohio

Emissions Unit ID: P507

SIC CODE 2865 SCC CODE 30102005 EMISSIONS UNIT ID P479

EMISSIONS UNIT DESCRIPTION Ball Mill D, equipment ID 34-21-105R

DATE INSTALLED 4/30/03

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

| Pollutants | Air Quality Description | Actual Emissions Rate | | PTI Allowable | |
|---|---|---|---|---|---|
| | | Short Term Rate | Tons Per Year | Short Term Rate | Tons Per Year |
| Particulate Matter | Attainment | 0.01 lb./hr | 0.05 TPY | 0.01 lb./hr | 0.05 TPY |
| $PM_{10}$ | Attainment | 0.01lb/hr | 0.05 TPY | 0.01lb/hr | 0.05 TPY |
| Sulfur Dioxide | Attainment | | | | |
| Organic Compounds | Non attainment | 1.73 lb/hr | 7.56 TPY | 1.73 lb/hr | 7.56 TPY |
| Nitrogen Oxides | Attainment | | | | |
| Carbon Monoxide | Attainment | | | | |
| Lead | Attainment | | | | |
| Other: Air Toxics | | | | | |

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

| WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION? |
|---|
| **Enter Determination** BAT satisfied by use of covers for VOC control, fabric filters for PM control, and compliance with Ohio Air Toxics Policy |

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes

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

**TOXIC AIR CONTAMINANTS**

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

AIR TOXICS MODELING PERFORMED*? X YES ____ NO

IDENTIFY THE AIR CONTAMINANTS: Xylene

**NEW SC**

PTI Num

FACILIT

Emissions Unit ID: P507

FACILITY DESCRIPTION Various emissions units to produce Milled/Dispersed Pigments; (8)ball mills, (11) high speed dispersers, (4) drais mills, (3) pony mixers, and (3) roll mills.

CITY/TWP Cincinnati Ohio

SIC CODE 2865 SCC CODE 30102005 EMISSIONS UNIT ID P480

EMISSIONS UNIT DESCRIPTION Ball Mill E, equipment ID 34-21-108R

DATE INSTALLED 4/30/03

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

| Pollutants | Air Quality Description | Actual Emissions Rate | | PTI Allowable | |
|---|---|---|---|---|---|
| | | Short Term Rate | Tons Per Year | Short Term Rate | Tons Per Year |
| Particulate Matter | Attainment | 0.01 lb./hr | 0.02 TPY | 0.01 lb./hr | 0.02 TPY |
| $PM_{10}$ | Attainment | 0.01 lb/hr | 0.02 TPY | 0.01lb/hr | 0.02 TPY |
| Sulfur Dioxide | Attainment | | | | |
| Organic Compounds | Non attainment | 0.65 lb/hr | 2.83 TPY | 0.65 lb/hr | 2.83 TPY |
| Nitrogen Oxides | Attainment | | | | |
| Carbon Monoxide | Attainment | | | | |
| Lead | Attainment | | | | |
| Other: Air Toxics | | | | | |

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

| WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION? |
|---|
| **Enter Determination** BAT satisfied by use of covers for VOC control, fabric filters for PM control, and compliance with Ohio Air Toxics Policy |

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes

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

**TOXIC AIR CONTAMINANTS**

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

AIR TOXICS MODELING PERFORMED*? X YES ____ NO

IDENTIFY THE AIR CONTAMINANTS:

**NEW SOURCE REVIEW FORM B**

PTI Number: 14-05390 Facility ID: 1431070039

FACILITY NAME Noveon Hilton Davis

FACILITY DESCRIPTION Various emissions units to produce CITY/TWP Cincinnati Ohio

Emissions Unit ID: P507

SIC CODE 2865 SCC CODE 30102005 EMISSIONS UNIT ID P481

EMISSIONS UNIT DESCRIPTION Ball Mill F, equipment ID 34-21-101R

DATE INSTALLED 4/30/03

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

| Pollutants | Air Quality Description | Actual Emissions Rate | | PTI Allowable | |
|---|---|---|---|---|---|
| | | Short Term Rate | Tons Per Year | Short Term Rate | Tons Per Year |
| Particulate Matter | Attainment | 0.01 lb/hr | 0.05 TPY | 0.01 lb/hr | 0.05 TPY |
| $PM_{10}$ | Attainment | 0.01 lb/hr | 0.05 TPY | 0.01 lb/hr | 0.05 TPY |
| Sulfur Dioxide | Attainment | | | | |
| Organic Compounds | Non attainment | 3.45 lbs/hr | 15.11 TPY | 3.45 lbs/hr | 15.11 TPY |
| Nitrogen Oxides | Attainment | | | | |
| Carbon Monoxide | Attainment | | | | |
| Lead | Attainment | | | | |
| Other: Air Toxics | | | | | |

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

| WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION? |
|---|
| **Enter Determination** BAT satisfied by use of covers for VOC control, fabric filters for PM control, and compliance with Ohio Air Toxics Policy |

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes

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

**TOXIC AIR CONTAMINANTS**

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

AIR TOXICS MODELING PERFORMED*? X YES ____ NO

IDENTIFY THE AIR CONTAMINANTS: Xylene

**NEW SOURCE REVIEW FORM B**

PTI Number: 14-05390 Facility ID: 1431070039

FACILITY NAME Noveon Hilton Davis

FACILITY DESCRIPTION Various emissions units to produce CITY/TWP Cincinnati Ohio

Emissions Unit ID: P507

SIC CODE 2865 SCC CODE 30102005 EMISSIONS UNIT ID P482

EMISSIONS UNIT DESCRIPTION Ball Mill G, equipment ID 34-21-106R

DATE INSTALLED 4/30/03

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

| Pollutants | Air Quality Description | Actual Emissions Rate | | PTI Allowable | |
|---|---|---|---|---|---|
| | | Short Term Rate | Tons Per Year | Short Term Rate | Tons Per Year |
| Particulate Matter | Attainment | 0.01 lb/hr | 0.03 TPY | 0.01 lb/hr | 0.03 TPY |
| $PM_{10}$ | Attainment | 0.01 lb/hr | 0.03 TPY | 0.01 lb/hr | 0.03 TPY |
| Sulfur Dioxide | Attainment | | | | |
| Organic Compounds | Non attainment | 1.73 lb/hr | 7.56 TPY | 1.73 lb/hr | 7.56 TPY |
| Nitrogen Oxides | Attainment | | | | |
| Carbon Monoxide | Attainment | | | | |
| Lead | Attainment | | | | |
| Other: Air Toxics | | | | | |

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

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

**Enter Determination** BAT satisfied by use of covers for VOC control, fabric filters for PM control, and compliance with Ohio Air Toxics Policy

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? YES

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

**TOXIC AIR CONTAMINANTS**

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

AIR TOXICS MODELING PERFORMED*? X YES ____ NO

IDENTIFY THE AIR CONTAMINANTS: Xylene

**NEW SC**
PTI Num
FACILIT

Emissions Unit ID: P507

FACILITY DESCRIPTION Various emissions units to produce Milled/Dispersed Pigments; (8)ball mills, (11) high speed dispersers, (4) drais mills, (3) pony mixers, and (3) roll mills.

CITY/TWP Cincinnati Ohio

SIC CODE 2865 SCC CODE 30102005 EMISSIONS UNIT ID P483

EMISSIONS UNIT DESCRIPTION Ball Mill L, equipment ID 34-21-102R

DATE INSTALLED 4/30/03

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

| Pollutants | Air Quality Description | Actual Emissions Rate | | PTI Allowable | |
|---|---|---|---|---|---|
| | | Short Term Rate | Tons Per Year | Short Term Rate | Tons Per Year |
| Particulate Matter | Attainment | 0.01 lb/hr | 0.03 TPY | 0.01 lb/hr | 0.03 TPY |
| $PM_{10}$ | Attainment | 0.01 lb/hr | 0.03 TPY | 0.01 lb/hr | 0.03 TPY |
| Sulfur Dioxide | Attainment | | | | |
| Organic Compounds | Non attainment | 1.20 lb/hr | 5.29 TPY | 1.20 lb/hr | 5.29 TPY |
| Nitrogen Oxides | Attainment | | | | |
| Carbon Monoxide | Attainment | | | | |
| Lead | Attainment | | | | |
| Other: Air Toxics | | | | | |

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

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

**Enter Determination** BAT satisfied by use of covers for VOC control, fabric filters for PM control, and compliance with Ohio Air Toxics Policy

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? YES

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

**TOXIC AIR CONTAMINANTS**

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

AIR TOXICS MODELING PERFORMED*? _____ YES _____ NO

IDENTIFY THE AIR CONTAMINANTS: Xylene

**NEW SOURCE REVIEW FORM B**

PTI Number: 14-05390 Facility ID: 1431070039

FACILITY NAME Noveon Hilton Davis

FACILITY DESCRIPTION Various emissions units to produce CITY/TWP Cincinnati Ohio

Emissions Unit ID: P507

SIC CODE 2865 SCC CODE 30102005 EMISSIONS UNIT ID P484

EMISSIONS UNIT DESCRIPTION High Speed Disperser 1, equipment ID 34-21-101M

DATE INSTALLED 4/30/03

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

| Pollutants | Air Quality Description | Actual Emissions Rate | | PTI Allowable | |
|---|---|---|---|---|---|
| | | Short Term Rate | Tons Per Year | Short Term Rate | Tons Per Year |
| Particulate Matter | Attainment | 0.03 lb/hr | 0.15 TPY | 0.03 lb/hr | 0.15 TPY |
| $PM_{10}$ | Attainment | 0.03 lb/hr | 0.15 TPY | 0.03 lb/hr | 0.15 TPY |
| Sulfur Dioxide | Attainment | | | | |
| Organic Compounds | Non attainment | 4.70 lb/hr | 20.56TPY | 4.70 lb/hr | 20.56TPY |
| Nitrogen Oxides | Attainment | | | | |
| Carbon Monoxide | Attainment | | | | |
| Lead | Attainment | | | | |
| Other: Air Toxics | | | | | |

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

| WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION? |
|---|
| **Enter Determination** BAT satisfied by use of covers for VOC control, fabric filters for PM control, and compliance with Ohio Air Toxics Policy |

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? YES

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

**TOXIC AIR CONTAMINANTS**

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

AIR TOXICS MODELING PERFORMED*? X YES ____ NO

IDENTIFY THE AIR CONTAMINANTS: Xylene

**NEW SOURCE REVIEW FORM B**

PTI Number: 14-05390 Facility ID: 1431070039

FACILITY NAME Noveon Hilton Davis

FACILITY DESCRIPTION Various emissions units to produce CITY/TWP Cincinnati Ohio

Emissions Unit ID: P507

SIC CODE 2865 SCC CODE 30102005 EMISSIONS UNIT ID P485

EMISSIONS UNIT DESCRIPTION High Speed Disperser 2, equipment ID 34-10-102M

DATE INSTALLED 4/30/03

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

| Pollutants | Air Quality Description | Actual Emissions Rate | | PTI Allowable | |
|---|---|---|---|---|---|
| | | Short Term Rate | Tons Per Year | Short Term Rate | Tons Per Year |
| Particulate Matter | Attainment | 0.03 lb/hr | 0.15 TPY | 0.03 lb/hr | 0.15 TPY |
| $PM_{10}$ | Attainment | 0.03 lb/hr | 0.15 TPY | 0.03 lb/hr | 0.15 TPY |
| Sulfur Dioxide | Attainment | | | | |
| Organic Compounds | Non attainment | 4.70 lb/hr | 20.56TPY | 4.70 lb/hr | 20.56TPY |
| Nitrogen Oxides | Attainment | | | | |
| Carbon Monoxide | Attainment | | | | |
| Lead | Attainment | | | | |
| Other: Air Toxics | | | | | |

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

| WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION? |
|---|
| **Enter Determination** BAT satisfied by use of covers for VOC control, fabric filters for PM control, and compliance with Ohio Air Toxics Policy |

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? YES

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

**TOXIC AIR CONTAMINANTS**

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

AIR TOXICS MODELING PERFORMED*? _____ YES _____ NO

IDENTIFY THE AIR CONTAMINANTS: _____

**NEW SC**

PTI Num

FACILIT

Emissions Unit ID: P507

FACILITY DESCRIPTION Various emissions units to produce Milled/Dispersed Pigments; (8)ball mills, (11) high speed dispersers, (4) drais mills, (3) pony mixers, and (3) roll mills.

CITY/TWP Cincinnati Ohio

SIC CODE 2865 SCC CODE 30102005 EMISSIONS UNIT ID P486

EMISSIONS UNIT DESCRIPTION High Speed Disperser 3, equipment ID 34-12-106M

DATE INSTALLED 4/30/03

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

| Pollutants | Air Quality Description | Actual Emissions Rate | | PTI Allowable | |
|---|---|---|---|---|---|
| | | Short Term Rate | Tons Per Year | Short Term Rate | Tons Per Year |
| Particulate Matter | Attainment | 0.03 lb/hr | 0.15 TPY | 0.03 lb/hr | 0.15 TPY |
| $PM_{10}$ | Attainment | 0.03 lb/hr | 0.15 TPY | 0.03 lb/hr | 0.15 TPY |
| Sulfur Dioxide | Attainment | | | | |
| Organic Compounds | Non attainment | 4.70 lb/hr | 20.56TPY | 4.70 lb/hr | 20.56TPY |
| Nitrogen Oxides | Attainment | | | | |
| Carbon Monoxide | Attainment | | | | |
| Lead | Attainment | | | | |
| Other: Air Toxics | | | | | |

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

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

**Enter Determination** BAT satisfied by use of covers for VOC control, fabric filters for PM control, and compliance with Ohio Air Toxics Policy

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? YES

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

**TOXIC AIR CONTAMINANTS**

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

AIR TOXICS MODELING PERFORMED*? X YES ___ NO

IDENTIFY THE AIR CONTAMINANTS: Xylene

**NEW SOURCE REVIEW FORM B**

PTI Number: 14-05390 Facility ID: 1431070039

FACILITY NAME Noveon Hilton Davis

FACILITY DESCRIPTION Various emissions units to produce CITY/TWP Cincinnati Ohio

Emissions Unit ID: P507

SIC CODE 2865 SCC CODE 30102005 EMISSIONS UNIT ID P487

EMISSIONS UNIT DESCRIPTION High Speed Disperser 4, equipment ID 34-12-105M

DATE INSTALLED 4/30/03

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

| Pollutants | Air Quality Description | Actual Emissions Rate | | PTI Allowable | |
|---|---|---|---|---|---|
| | | Short Term Rate | Tons Per Year | Short Term Rate | Tons Per Year |
| Particulate Matter | Attainment | 0.03 lb/hr | 0.15 TPY | 0.03 lb/hr | 0.15 TPY |
| $PM_{10}$ | Attainment | 0.03 lb/hr | 0.15 TPY | 0.03 lb/hr | 0.15 TPY |
| Sulfur Dioxide | Attainment | | | | |
| Organic Compounds | Non attainment | 4.70 lb/hr | 20.56TPY | 4.70 lb/hr | 20.56TPY |
| Nitrogen Oxides | Attainment | | | | |
| Carbon Monoxide | Attainment | | | | |
| Lead | Attainment | | | | |
| Other: Air Toxics | | | | | |

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

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

**Enter Determination** BAT satisfied by use of covers for VOC control, fabric filters for PM control, and compliance with Ohio Air Toxics Policy

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? YES

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

**TOXIC AIR CONTAMINANTS**

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

AIR TOXICS MODELING PERFORMED*? X YES ____ NO

IDENTIFY THE AIR CONTAMINANTS: Xylene

**NEW SOURCE REVIEW FORM B**

PTI Number: 14-05390 Facility ID: 1431070039

FACILITY NAME Noveon Hilton Davis

FACILITY DESCRIPTION Various emissions units to produce CITY/TWP Cincinnati Ohio

Emissions Unit ID: P507

SIC CODE 2865 SCC CODE 30102005 EMISSIONS UNIT ID P488

EMISSIONS UNIT DESCRIPTION High Speed Disperser 5, equipment ID 34-12-103M

DATE INSTALLED 4/30/03

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

| Pollutants | Air Quality Description | Actual Emissions Rate | | PTI Allowable | |
|---|---|---|---|---|---|
| | | Short Term Rate | Tons Per Year | Short Term Rate | Tons Per Year |
| Particulate Matter | Attainment | 0.03 lb/hr | 0.15 TPY | 0.03 lb/hr | 0.15 TPY |
| $PM_{10}$ | Attainment | 0.03 lb/hr | 0.15 TPY | 0.03 lb/hr | 0.15 TPY |
| Sulfur Dioxide | Attainment | | | | |
| Organic Compounds | Non attainment | 4.70 lb/hr | 20.56TPY | 4.70 lb/hr | 20.56TPY |
| Nitrogen Oxides | Attainment | | | | |
| Carbon Monoxide | Attainment | | | | |
| Lead | Attainment | | | | |
| Other: Air Toxics | | | | | |

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

| WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION? |
|---|
| **Enter Determination** BAT is satisfied by use of building enclosure for particulate control, covers to control VOC, and compliance with Ohio EPA Air Toxics Policy. |

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? YES

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

**TOXIC AIR CONTAMINANTS**

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

AIR TOXICS MODELING PERFORMED*? X YES ____ NO

IDENTIFY THE AIR CONTAMINANTS: Xylene

**NEW SC**

PTI Num

FACILIT

Emissions Unit ID: P507

FACILITY DESCRIPTION Various emissions units to produce Milled/Dispersed Pigments; (8)ball mills, (11) high speed dispersers, (4) drais mills, (3) pony mixers, and (3) roll mills.

CITY/TWP Cincinnati Ohio

SIC CODE 2865 SCC CODE 30102005 EMISSIONS UNIT ID P489

EMISSIONS UNIT DESCRIPTION High Speed Disperser 6, equipment ID 34-12-104M

DATE INSTALLED 4/30/03

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

| Pollutants | Air Quality Description | Actual Emissions Rate | | PTI Allowable | |
|---|---|---|---|---|---|
| | | Short Term Rate | Tons Per Year | Short Term Rate | Tons Per Year |
| Particulate Matter | Attainment | 0.03 lb/hr | 0.15 TPY | 0.03 lb/hr | 0.15 TPY |
| $PM_{10}$ | Attainment | 0.03 lb/hr | 0.15 TPY | 0.03 lb/hr | 0.15 TPY |
| Sulfur Dioxide | Attainment | | | | |
| Organic Compounds | Non attainment | 4.70 lb/hr | 20.56TPY | 4.70 lb/hr | 20.56TPY |
| Nitrogen Oxides | Attainment | | | | |
| Carbon Monoxide | Attainment | | | | |
| Lead | Attainment | | | | |
| Other: Air Toxics | | | | | |

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

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

**Enter Determination** BAT is satisfied by use of building enclosure for particulate control, covers to control VOC, and compliance with Ohio EPA Air Toxics Policy.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? YES

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

**TOXIC AIR CONTAMINANTS**

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

AIR TOXICS MODELING PERFORMED*? X YES ___ NO

IDENTIFY THE AIR CONTAMINANTS: Xylene

**NEW SOURCE REVIEW FORM B**

PTI Number: 14-05390 Facility ID: 1431070039

FACILITY NAME Noveon Hilton Davis

FACILITY DESCRIPTION Various emissions units to produce CITY/TWP Cincinnati Ohio

Emissions Unit ID: P507

SIC CODE 2865 SCC CODE 30102005 EMISSIONS UNIT ID P490

EMISSIONS UNIT DESCRIPTION High Speed Disperser 7, equipment ID 34-21-103M

DATE INSTALLED 4/30/03

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

| Pollutants | Air Quality Description | Actual Emissions Rate | | PTI Allowable | |
|---|---|---|---|---|---|
| | | Short Term Rate | Tons Per Year | Short Term Rate | Tons Per Year |
| Particulate Matter | Attainment | 0.03 lb/hr | 0.15 TPY | 0.03 lb/hr | 0.15 TPY |
| $PM_{10}$ | Attainment | 0.03 lb/hr | 0.15 TPY | 0.03 lb/hr | 0.15 TPY |
| Sulfur Dioxide | Attainment | | | | |
| Organic Compounds | Non attainment | 4.70 lb/hr | 20.56TPY | 4.70 lb/hr | 20.56TPY |
| Nitrogen Oxides | Attainment | | | | |
| Carbon Monoxide | Attainment | | | | |
| Lead | Attainment | | | | |
| Other: Air Toxics | | | | | |

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

| WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION? |
|---|
| **Enter Determination** BAT is satisfied by use of building enclosure for particulate control, covers to control VOC, and compliance with Ohio EPA Air Toxics Policy. |

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? YES

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

**TOXIC AIR CONTAMINANTS**

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

AIR TOXICS MODELING PERFORMED*? X YES ____ NO

IDENTIFY THE AIR CONTAMINANTS: Xylene

**NEW SOURCE REVIEW FORM B**

PTI Number: 14-05390 Facility ID: 1431070039

FACILITY NAME Noveon Hilton Davis

FACILITY DESCRIPTION Various emissions units to produce CITY/TWP Cincinnati Ohio

Emissions Unit ID: P507

SIC CODE 2865 SCC CODE 30102005 EMISSIONS UNIT ID P491

EMISSIONS UNIT DESCRIPTION High Speed Disperser 8, equipment ID 34-21-105M

DATE INSTALLED 4/30/03

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

| Pollutants | Air Quality Description | Actual Emissions Rate | | PTI Allowable | |
|---|---|---|---|---|---|
| | | Short Term Rate | Tons Per Year | Short Term Rate | Tons Per Year |
| Particulate Matter | Attainment | 0.03 lb/hr | 0.15 TPY | 0.03 lb/hr | 0.15 TPY |
| $PM_{10}$ | Attainment | 0.03 lb/hr | 0.15 TPY | 0.03 lb/hr | 0.15 TPY |
| Sulfur Dioxide | Attainment | | | | |
| Organic Compounds | Non attainment | 4.70 lb/hr | 20.56TPY | 4.70 lb/hr | 20.56TPY |
| Nitrogen Oxides | Attainment | | | | |
| Carbon Monoxide | Attainment | | | | |
| Lead | Attainment | | | | |
| Other: Air Toxics | | | | | |

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

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

**Enter Determination** BAT is satisfied by use of building enclosure for particulate control, covers to control VOC, and compliance with Ohio EPA Air Toxics Policy.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? YES

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

**TOXIC AIR CONTAMINANTS**

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

AIR TOXICS MODELING PERFORMED*? X YES ____ NO

IDENTIFY THE AIR CONTAMINANTS: Xylene

**NEW SC**

PTI Num

FACILIT

Emissions Unit ID: P507

FACILITY DESCRIPTION Various emissions units to produce Milled/Dispersed Pigments; (8)ball mills, (11) high speed dispersers, (4) drais mills, (3) pony mixers, and (3) roll mills.

CITY/TWP Cincinnati Ohio

SIC CODE 2865 SCC CODE 30102005 EMISSIONS UNIT ID P492

EMISSIONS UNIT DESCRIPTION High Speed Disperser 9, equipment ID 34-21-102M

DATE INSTALLED 4/30/03

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

| Pollutants | Air Quality Description | Actual Emissions Rate | | PTI Allowable | |
|---|---|---|---|---|---|
| | | Short Term Rate | Tons Per Year | Short Term Rate | Tons Per Year |
| Particulate Matter | Attainment | 0.03 lb/hr | 0.15 TPY | 0.03 lb/hr | 0.15 TPY |
| $PM_{10}$ | Attainment | 0.03 lb/hr | 0.15 TPY | 0.03 lb/hr | 0.15 TPY |
| Sulfur Dioxide | Attainment | | | | |
| Organic Compounds | Non attainment | 4.70 lb/hr | 20.56TPY | 4.70 lb/hr | 20.56TPY |
| Nitrogen Oxides | Attainment | | | | |
| Carbon Monoxide | Attainment | | | | |
| Lead | Attainment | | | | |
| Other: Air Toxics | | | | | |

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

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

**Enter Determination** BAT is satisfied by use of building enclosure for particulate control, covers to control VOC, and compliance with Ohio EPA Air Toxics Policy.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? YES

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

**TOXIC AIR CONTAMINANTS**

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

AIR TOXICS MODELING PERFORMED*? X YES ___ NO

IDENTIFY THE AIR CONTAMINANTS: Xylene

**NEW SOURCE REVIEW FORM B**

PTI Number: 14-05390 Facility ID: 1431070039

FACILITY NAME Noveon Hilton Davis

FACILITY DESCRIPTION Various emissions units to produce CITY/TWP Cincinnati Ohio

Emissions Unit ID: P507

SIC CODE 2865 SCC CODE 30102005 EMISSIONS UNIT ID P493

EMISSIONS UNIT DESCRIPTION High Speed Disperser 10, equipment ID undecided.

DATE INSTALLED 4/30/03

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

| Pollutants | Air Quality Description | Actual Emissions Rate | | PTI Allowable | |
|---|---|---|---|---|---|
| | | Short Term Rate | Tons Per Year | Short Term Rate | Tons Per Year |
| Particulate Matter | Attainment | 0.03 lb/hr | 0.15 TPY | 0.03 lb/hr | 0.15 TPY |
| $PM_{10}$ | Attainment | 0.03 lb/hr | 0.15 TPY | 0.03 lb/hr | 0.15 TPY |
| Sulfur Dioxide | Attainment | | | | |
| Organic Compounds | Non attainment | 4.70 lb/hr | 20.56TPY | 4.70 lb/hr | 20.56TPY |
| Nitrogen Oxides | Attainment | | | | |
| Carbon Monoxide | Attainment | | | | |
| Lead | Attainment | | | | |
| Other: Air Toxics | | | | | |

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

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

**Enter Determination** BAT is satisfied by use of building enclosure for particulate control, covers to control VOC, and compliance with Ohio EPA Air Toxics Policy.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? YES

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

**TOXIC AIR CONTAMINANTS**

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

AIR TOXICS MODELING PERFORMED*? X YES ____ NO

IDENTIFY THE AIR CONTAMINANTS: Xylene

**NEW SOURCE REVIEW FORM B**

PTI Number: 14-05390 Facility ID: 1431070039

FACILITY NAME Noveon Hilton Davis

FACILITY DESCRIPTION Various emissions units to produce CITY/TWP Cincinnati Ohio

Emissions Unit ID: P507

SIC CODE 2865 SCC CODE 30102005 EMISSIONS UNIT ID P494

EMISSIONS UNIT DESCRIPTION High Speed Disperser 11, equipment ID undecided.

DATE INSTALLED 4/30/03

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

| Pollutants | Air Quality Description | Actual Emissions Rate | | PTI Allowable | |
|---|---|---|---|---|---|
| | | Short Term Rate | Tons Per Year | Short Term Rate | Tons Per Year |
| Particulate Matter | Attainment | 0.03 lb/hr | 0.15 TPY | 0.03 lb/hr | 0.15 TPY |
| $PM_{10}$ | Attainment | 0.03 lb/hr | 0.15 TPY | 0.03 lb/hr | 0.15 TPY |
| Sulfur Dioxide | Attainment | | | | |
| Organic Compounds | Non attainment | 4.70 lb/hr | 20.56TPY | 4.70 lb/hr | 20.56TPY |
| Nitrogen Oxides | Attainment | | | | |
| Carbon Monoxide | Attainment | | | | |
| Lead | Attainment | | | | |
| Other: Air Toxics | | | | | |

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

| WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION? |
|---|
| **Enter Determination** BAT is satisfied by use of building enclosure for particulate control, covers to control VOC, and compliance with Ohio EPA Air Toxics Policy. |

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? YES

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

**TOXIC AIR CONTAMINANTS**

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

AIR TOXICS MODELING PERFORMED*? X YES ____ NO

IDENTIFY THE AIR CONTAMINANTS: Xylene

**NEW SC**

PTI Num

FACILIT

Emissions Unit ID: P507

FACILITY DESCRIPTION Various emissions units to produce Milled/Dispersed Pigments; (8)ball mills, (11) high speed dispersers, (4) drais mills, (3) pony mixers, and (3) roll mills.

CITY/TWP Cincinnati Ohio

SIC CODE 2865 SCC CODE 30102005 EMISSIONS UNIT ID P495

EMISSIONS UNIT DESCRIPTION Drais Mill 1 DR, equipment ID 34-12-101S

DATE INSTALLED 4/30/03

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

| Pollutants | Air Quality Description | Actual Emissions Rate | | PTI Allowable | |
|---|---|---|---|---|---|
| | | Short Term Rate | Tons Per Year | Short Term Rate | Tons Per Year |
| Particulate Matter | Attainment | 0.03 lb/hr | 0.15 TPY | 0.03 lb/hr | 0.15 TPY |
| $PM_{10}$ | Attainment | 0.03 lb/hr | 0.15 TPY | 0.03 lb/hr | 0.15 TPY |
| Sulfur Dioxide | Attainment | | | | |
| Organic Compounds | Non attainment | 1.17 lb/hr | 5.14 TPY | 1.17 lb/hr | 5.14 TPY |
| Nitrogen Oxides | Attainment | | | | |
| Carbon Monoxide | Attainment | | | | |
| Lead | Attainment | | | | |
| Other: Air Toxics | | | | | |

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

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

**Enter Determination** BAT is satisfied by use of building enclosure for particulate control, covers to control VOC, and compliance with Ohio EPA Air Toxics Policy.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? YES

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

**TOXIC AIR CONTAMINANTS**

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

AIR TOXICS MODELING PERFORMED*? X YES ___ NO

IDENTIFY THE AIR CONTAMINANTS: Xylene

**NEW SOURCE REVIEW FORM B**

PTI Number: 14-05390 Facility ID: 1431070039

FACILITY NAME Noveon Hilton Davis

FACILITY DESCRIPTION Various emissions units to produce CITY/TWP Cincinnati Ohio

Emissions Unit ID: P507

SIC CODE 2865 SCC CODE 30102005 EMISSIONS UNIT ID P496

EMISSIONS UNIT DESCRIPTION Drais Mill 2 DR, equipment ID 34-10-101S

DATE INSTALLED 4/30/03

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

| Pollutants | Air Quality Description | Actual Emissions Rate | | PTI Allowable | |
|---|---|---|---|---|---|
| | | Short Term Rate | Tons Per Year | Short Term Rate | Tons Per Year |
| Particulate Matter | Attainment | 0.07 lb/hr | 0.30 TPY | 0.14 lb/hr | 0.3 TPY |
| $PM_{10}$ | Attainment | 0.07 lb/hr | 0.30 TPY | 0.07 lb/hr | 0.30 TPY |
| Sulfur Dioxide | Attainment | | | | |
| Organic Compounds | Non attainment | 2.35 lb/hr | 10.28 TPY | 2.35 lb/hr | 10.28 TPY |
| Nitrogen Oxides | Attainment | | | | |
| Carbon Monoxide | Attainment | | | | |
| Lead | Attainment | | | | |
| Other: Air Toxics | | | | | |

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

| WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION? |
|---|
| **Enter Determination** BAT is satisfied by use of building enclosure for particulate control, covers to control VOC, and compliance with Ohio EPA Air Toxics Policy. |

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? YES

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

**TOXIC AIR CONTAMINANTS**

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

AIR TOXICS MODELING PERFORMED*? X YES ____ NO

IDENTIFY THE AIR CONTAMINANTS: Xylene

**NEW SOURCE REVIEW FORM B**

PTI Number: 14-05390 Facility ID: 1431070039

FACILITY NAME Noveon Hilton Davis

FACILITY DESCRIPTION Various emissions units to produce CITY/TWP Cincinnati Ohio

Emissions Unit ID: P507

SIC CODE 2865 SCC CODE 30102005 EMISSIONS UNIT ID P497

EMISSIONS UNIT DESCRIPTION Drais Mill 3 DR, equipment ID 34-12-102S

DATE INSTALLED 4/30/03

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

| Pollutants | Air Quality Description | Actual Emissions Rate | | PTI Allowable | |
|---|---|---|---|---|---|
| | | Short Term Rate | Tons Per Year | Short Term Rate | Tons Per Year |
| Particulate Matter | Attainment | 0.10 lb/hr | 0.45 TPY | 0.10 lb/hr | 0.45 TPY |
| $PM_{10}$ | Attainment | 0.10 lb/hr | 0.45 TPY | 0.10 lb/hr | 0.45 TPY |
| Sulfur Dioxide | Attainment | | | | |
| Organic Compounds | Non attainment | 3.52 lbs/hr | 15.42 TPY | 3.52 lbs/hr | 15.42 TPY |
| Nitrogen Oxides | Attainment | | | | |
| Carbon Monoxide | Attainment | | | | |
| Lead | Attainment | | | | |
| Other: Air Toxics | | | | | |

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

| WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION? |
|---|
| **Enter Determination** BAT is satisfied by use of building enclosure for particulate control, covers to control VOC, and compliance with Ohio EPA Air Toxics Policy. |

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? YES

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

**TOXIC AIR CONTAMINANTS**

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

AIR TOXICS MODELING PERFORMED*? X YES ____ NO

IDENTIFY THE AIR CONTAMINANTS: Xylene

**NEW SC**
PTI Num
FACILIT

Emissions Unit ID: P507

FACILITY DESCRIPTION Various emissions units to produce Milled/Dispersed Pigments; (8)ball mills, (11) high speed dispersers, (4) drais mills, (3) pony mixers, and (3) roll mills.

CITY/TWP Cincinnati Ohio

SIC CODE 2865 SCC CODE 30102005 EMISSIONS UNIT ID P498

EMISSIONS UNIT DESCRIPTION Drais Mill 4 DR, equipment ID 34-12-110S

DATE INSTALLED 4/30/03

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

| Pollutants | Air Quality Description | Actual Emissions Rate | | PTI Allowable | |
|---|---|---|---|---|---|
| | | Short Term Rate | Tons Per Year | Short Term Rate | Tons Per Year |
| Particulate Matter | Attainment | 0.14 lb/hr | 0.60 TPY | 0.14 lb/hr | 0.60 TPY |
| $PM_{10}$ | Attainment | 0.14 lb/hr | 0.60 TPY | 0.14 lb/hr | 0.60 TPY |
| Sulfur Dioxide | Attainment | | | | |
| Organic Compounds | Non attainment | 4.70 lbs/hr | 20.56 TPY | 4.70 lbs/hr | 20.56 TPY |
| Nitrogen Oxides | Attainment | | | | |
| Carbon Monoxide | Attainment | | | | |
| Lead | Attainment | | | | |
| Other: Air Toxics | | | | | |

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

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

**Enter Determination** BAT is satisfied by use of building enclosure for particulate control, covers to control VOC, and compliance with Ohio EPA Air Toxics Policy.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? YES

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

**TOXIC AIR CONTAMINANTS**

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

AIR TOXICS MODELING PERFORMED*? X YES ___ NO

IDENTIFY THE AIR CONTAMINANTS: Xylene

**NEW SOURCE REVIEW FORM B**

PTI Number: 14-05390 Facility ID: 1431070039

FACILITY NAME Noveon Hilton Davis

FACILITY DESCRIPTION Various emissions units to produce CITY/TWP Cincinnati Ohio

Emissions Unit ID: P507

SIC CODE 2865 SCC CODE 30102005 EMISSIONS UNIT ID P499

EMISSIONS UNIT DESCRIPTION Pony Mixer 1, equipment ID 34-21-104M

DATE INSTALLED 4/30/03

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

| Pollutants | Air Quality Description | Actual Emissions Rate | | PTI Allowable | |
|---|---|---|---|---|---|
| | | Short Term Rate | Tons Per Year | Short Term Rate | Tons Per Year |
| Particulate Matter | Attainment | 0.01 lb/hr | 0.03 TPY | 0.01 lb/hr | 0.03 TPY |
| $PM_{10}$ | Attainment | 0.01 lb/hr | 0.03 TPY | 0.01 lb/hr | 0.03 TPY |
| Sulfur Dioxide | Attainment | | | | |
| Organic Compounds | Non attainment | 4.40 lbs/hr | 19.27 TPY | 4.40 lbs/hr | 19.27 TPY |
| Nitrogen Oxides | Attainment | | | | |
| Carbon Monoxide | Attainment | | | | |
| Lead | Attainment | | | | |
| Other: Air Toxics | | | | | |

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

| WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION? |
|---|
| **Enter Determination** BAT satisfied by use of covers for VOC control, fabric filters for PM control, and compliance with Ohio Air Toxics Policy |

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? YES

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

**TOXIC AIR CONTAMINANTS**

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

AIR TOXICS MODELING PERFORMED*? X YES ____ NO

IDENTIFY THE AIR CONTAMINANTS: Xylene

**NEW SOURCE REVIEW FORM B**

PTI Number: 14-05390 Facility ID: 1431070039

FACILITY NAME Noveon Hilton Davis

FACILITY DESCRIPTION Various emissions units to produce CITY/TWP Cincinnati Ohio

Emissions Unit ID: P507

SIC CODE 2865 SCC CODE 30102005 EMISSIONS UNIT ID P500

EMISSIONS UNIT DESCRIPTION Pony Mixer 2, equipment ID 34-12-108M

DATE INSTALLED 4/30/03

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

| Pollutants | Air Quality Description | Actual Emissions Rate | | PTI Allowable | |
|---|---|---|---|---|---|
| | | Short Term Rate | Tons Per Year | Short Term Rate | Tons Per Year |
| Particulate Matter | Attainment | 0.03 lb/hr | 0.12 TPY | 0.03 lb/hr | 0.12 TPY |
| $PM_{10}$ | Attainment | 0.03 lb/hr | 0.12 TPY | 0.03 lb/hr | 0.12 TPY |
| Sulfur Dioxide | Attainment | | | | |
| Organic Compounds | Non attainment | 4.40 lbs/hr | 19.27 TPY | 4.40 lbs/hr | 19.27 TPY |
| Nitrogen Oxides | Attainment | | | | |
| Carbon Monoxide | Attainment | | | | |
| Lead | Attainment | | | | |
| Other: Air Toxics | | | | | |

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

| WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION? |
|---|
| **Enter Determination** BAT satisfied by use of covers for VOC control, fabric filters for PM control, and compliance with Ohio Air Toxics Policy |

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? YES

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

**TOXIC AIR CONTAMINANTS**

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

AIR TOXICS MODELING PERFORMED*? X YES ____ NO

IDENTIFY THE AIR CONTAMINANTS: Xylene

**NEW SC**
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FACILIT

Emissions Unit ID: P507

FACILITY DESCRIPTION Various emissions units to produce Milled/Dispersed Pigments; (8)ball mills, (11) high speed dispersers, (4) drais mills, (3) pony mixers, and (3) roll mills.

CITY/TWP Cincinnati Ohio

SIC CODE 2865 SCC CODE 30102005 EMISSIONS UNIT ID P501

EMISSIONS UNIT DESCRIPTION Pony Mixer 3, equipment ID 34-12-106M

DATE INSTALLED 4/30/03

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

| Pollutants | Air Quality Description | Actual Emissions Rate | | PTI Allowable | |
|---|---|---|---|---|---|
| | | Short Term Rate | Tons Per Year | Short Term Rate | Tons Per Year |
| Particulate Matter | Attainment | 0.03 lb/hr | 0.12 TPY | 0.03 lb/hr | 0.12 TPY |
| $PM_{10}$ | Attainment | 0.03 lb/hr | 0.12 TPY | 0.03 lb/hr | 0.12 TPY |
| Sulfur Dioxide | Attainment | | | | |
| Organic Compounds | Non attainment | 4.40 lbs/hr | 19.27 TPY | 4.40 lbs/hr | 19.27 TPY |
| Nitrogen Oxides | Attainment | | | | |
| Carbon Monoxide | Attainment | | | | |
| Lead | Attainment | | | | |
| Other: Air Toxics | | | | | |

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

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

**Enter Determination** BAT satisfied by use of covers for VOC control, fabric filters for PM control, and compliance with Ohio Air Toxics Policy

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? YES

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

**TOXIC AIR CONTAMINANTS**

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

AIR TOXICS MODELING PERFORMED*? X YES ___ NO

IDENTIFY THE AIR CONTAMINANTS: Xylene

**NEW SOURCE REVIEW FORM B**

PTI Number: 14-05390 Facility ID: 1431070039

FACILITY NAME Noveon Hilton Davis

FACILITY DESCRIPTION Various emissions units to produce CITY/TWP Cincinnati Ohio

Emissions Unit ID: P507

SIC CODE 2865 SCC CODE 30102005 EMISSIONS UNIT ID P502

EMISSIONS UNIT DESCRIPTION Roll Mill 1, equipment ID 34-21-110S

DATE INSTALLED 4/30/03

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

| Pollutants | Air Quality Description | Actual Emissions Rate | | PTI Allowable | |
|---|---|---|---|---|---|
| | | Short Term Rate | Tons Per Year | Short Term Rate | Tons Per Year |
| Particulate Matter | Attainment | 0.03 lb/hr | 0.12 TPY | 0.03 lb/hr | 0.12 TPY |
| $PM_{10}$ | Attainment | 0.03 lb/hr | 0.12 TPY | 0.03 lb/hr | 0.12 TPY |
| Sulfur Dioxide | Attainment | | | | |
| Organic Compounds | Non attainment | 4.40 lbs/hr | 19.27 TPY | 4.40 lbs/hr | 19.27 TPY |
| Nitrogen Oxides | Attainment | | | | |
| Carbon Monoxide | Attainment | | | | |
| Lead | Attainment | | | | |
| Other: Air Toxics | | | | | |

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

| WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION? |
|---|
| **Enter Determination** BAT is satisfied by use of building enclosure for particulate control, covers to control VOC, and compliance with Ohio EPA Air Toxics Policy. |

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? YES

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

**TOXIC AIR CONTAMINANTS**

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

AIR TOXICS MODELING PERFORMED*? X YES ____ NO

IDENTIFY THE AIR CONTAMINANTS: Xylene

**NEW SOURCE REVIEW FORM B**

PTI Number: 14-05390 Facility ID: 1431070039

FACILITY NAME Noveon Hilton Davis

FACILITY DESCRIPTION Various emissions units to produce CITY/TWP Cincinnati Ohio

Emissions Unit ID: P507

SIC CODE 2865 SCC CODE 30102005 EMISSIONS UNIT ID P503

EMISSIONS UNIT DESCRIPTION Roll Mill 2, equipment ID not yet assigned

DATE INSTALLED 4/30/03

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

| Pollutants | Air Quality Description | Actual Emissions Rate | | PTI Allowable | |
|---|---|---|---|---|---|
| | | Short Term Rate | Tons Per Year | Short Term Rate | Tons Per Year |
| Particulate Matter | Attainment | 0.03 lb/hr | 0.12 TPY | 0.03 lb/hr | 0.12 TPY |
| $PM_{10}$ | Attainment | 0.03 lb/hr | 0.12 TPY | 0.03 lb/hr | 0.12 TPY |
| Sulfur Dioxide | Attainment | | | | |
| Organic Compounds | Non attainment | 4.40 lbs/hr | 19.27 TPY | 4.40 lbs/hr | 19.27 TPY |
| Nitrogen Oxides | Attainment | | | | |
| Carbon Monoxide | Attainment | | | | |
| Lead | Attainment | | | | |
| Other: Air Toxics | | | | | |

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

| WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION? |
|---|
| **Enter Determination** BAT is satisfied by use of building enclosure for particulate control, covers to control VOC, and compliance with Ohio EPA Air Toxics Policy. |

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? YES

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

**TOXIC AIR CONTAMINANTS**

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

AIR TOXICS MODELING PERFORMED*? X YES ____ NO

IDENTIFY THE AIR CONTAMINANTS: Xylene

**NEW SC**

PTI Num

FACILIT

Emissions Unit ID: P507

FACILITY DESCRIPTION Various emissions units to produce Milled/Dispersed Pigments; (8)ball mills, (11) high speed dispersers, (4) drais mills, (3) pony mixers, and (3) roll mills.

CITY/TWP Cincinnati Ohio

SIC CODE 2865 SCC CODE 30102005 EMISSIONS UNIT ID P504

EMISSIONS UNIT DESCRIPTION Roll Mill 3, equipment ID 34-12-109S

DATE INSTALLED 4/30/03

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

| Pollutants | Air Quality Description | Actual Emissions Rate | | PTI Allowable | |
|---|---|---|---|---|---|
| | | Short Term Rate | Tons Per Year | Short Term Rate | Tons Per Year |
| Particulate Matter | Attainment | 0.03 lb/hr | 0.12 TPY | 0.03 lb/hr | 0.12 TPY |
| $PM_{10}$ | Attainment | 0.03 lb/hr | 0.12 TPY | 0.03 lb/hr | 0.12 TPY |
| Sulfur Dioxide | Attainment | | | | |
| Organic Compounds | Non attainment | 4.40 lbs/hr | 19.27 TPY | 4.40 lbs/hr | 19.27 TPY |
| Nitrogen Oxides | Attainment | | | | |
| Carbon Monoxide | Attainment | | | | |
| Lead | Attainment | | | | |
| Other: Air Toxics | | | | | |

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

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

**Enter Determination** BAT is satisfied by use of building enclosure for particulate control, covers to control VOC, and compliance with Ohio EPA Air Toxics Policy.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? YES

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

**TOXIC AIR CONTAMINANTS**

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

AIR TOXICS MODELING PERFORMED*? X YES ___ NO

IDENTIFY THE AIR CONTAMINANTS: Xylene

**NEW SOURCE REVIEW FORM B**

PTI Number: 14-05390 Facility ID: 1431070039

FACILITY NAME Noveon Hilton Davis

FACILITY DESCRIPTION Various emissions units to produce CITY/TWP Cincinnati Ohio

Emissions Unit ID: P507

SIC CODE 2865 SCC CODE 30102005 EMISSIONS UNIT ID P505

EMISSIONS UNIT DESCRIPTION Roll Mill 4, equipment ID not yet assigned

DATE INSTALLED 4/30/03

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

| Pollutants | Air Quality Description | Actual Emissions Rate | | PTI Allowable | |
|---|---|---|---|---|---|
| | | Short Term Rate | Tons Per Year | Short Term Rate | Tons Per Year |
| Particulate Matter | Attainment | 0.03 lb/hr | 0.12 TPY | 0.03 lb/hr | 0.12 TPY |
| $PM_{10}$ | Attainment | 0.03 lb/hr | 0.12 TPY | 0.03 lb/hr | 0.12 TPY |
| Sulfur Dioxide | Attainment | | | | |
| Organic Compounds | Non attainment | 4.40 lbs/hr | 19.27 TPY | 4.40 lbs/hr | 19.27 TPY |
| Nitrogen Oxides | Attainment | | | | |
| Carbon Monoxide | Attainment | | | | |
| Lead | Attainment | | | | |
| Other: Air Toxics | | | | | |

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

| WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION? |
|---|
| **Enter Determination** BAT is satisfied by use of building enclosure for particulate control, covers to control VOC, and compliance with Ohio EPA Air Toxics Policy. |

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? YES

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

**TOXIC AIR CONTAMINANTS**

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

AIR TOXICS MODELING PERFORMED*? X YES ____ NO

IDENTIFY THE AIR CONTAMINANTS: Xylene

**NEW SOURCE REVIEW FORM B**

PTI Number: 14-05390 Facility ID: 1431070039

FACILITY NAME Noveon Hilton Davis

FACILITY DESCRIPTION Various emissions units to produce CITY/TWP Cincinnati Ohio

Emissions Unit ID: P507

SIC CODE 2865 SCC CODE 30102005 EMISSIONS UNIT ID P506

EMISSIONS UNIT DESCRIPTION Roll Mill 5, equipment ID not yet assigned

DATE INSTALLED 4/30/03

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

| Pollutants | Air Quality Description | Actual Emissions Rate | | PTI Allowable | |
|---|---|---|---|---|---|
| | | Short Term Rate | Tons Per Year | Short Term Rate | Tons Per Year |
| Particulate Matter | Attainment | 0.03 lb/hr | 0.12 TPY | 0.03 lb/hr | 0.12 TPY |
| $PM_{10}$ | Attainment | 0.03 lb/hr | 0.12 TPY | 0.03 lb/hr | 0.12 TPY |
| Sulfur Dioxide | Attainment | | | | |
| Organic Compounds | Non attainment | 4.40 lbs/hr | 19.27 TPY | 4.40 lbs/hr | 19.27 TPY |
| Nitrogen Oxides | Attainment | | | | |
| Carbon Monoxide | Attainment | | | | |
| Lead | Attainment | | | | |
| Other: Air Toxics | | | | | |

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

| WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION? |
|---|
| **Enter Determination** BAT is satisfied by use of building enclosure for particulate control, covers to control VOC, and compliance with Ohio EPA Air Toxics Policy. |

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? YES

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

**TOXIC AIR CONTAMINANTS**

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

AIR TOXICS MODELING PERFORMED*? X YES ____ NO

IDENTIFY THE AIR CONTAMINANTS: Xylene

**NEW SC**

PTI Num

FACILIT

Emissions Unit ID: P507

FACILITY DESCRIPTION Various emissions units to produce Milled/Dispersed Pigments; (8)ball mills, (11) high speed dispersers, (4) drais mills, (3) pony mixers, and (3) roll mills.

CITY/TWP Cincinnati Ohio

SIC CODE 2865 SCC CODE 30102005 EMISSIONS UNIT ID P507

EMISSIONS UNIT DESCRIPTION Roll Mill 6, equipment ID not yet assigned

DATE INSTALLED 4/30/03

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

| Pollutants | Air Quality Description | Actual Emissions Rate | | PTI Allowable | |
|---|---|---|---|---|---|
| | | Short Term Rate | Tons Per Year | Short Term Rate | Tons Per Year |
| Particulate Matter | Attainment | 0.03 lb/hr | 0.12 TPY | 0.03 lb/hr | 0.12 TPY |
| $PM_{10}$ | Attainment | 0.03 lb/hr | 0.12 TPY | 0.03 lb/hr | 0.12 TPY |
| Sulfur Dioxide | Attainment | | | | |
| Organic Compounds | Non attainment | 4.40 lbs/hr | 19.27 TPY | 4.40 lbs/hr | 19.27 TPY |
| Nitrogen Oxides | Attainment | | | | |
| Carbon Monoxide | Attainment | | | | |
| Lead | Attainment | | | | |
| Other: Air Toxics | | | | | |

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

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

**Enter Determination** BAT is satisfied by use of building enclosure for particulate control, covers to control VOC, and compliance with Ohio EPA Air Toxics Policy.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? YES

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

**TOXIC AIR CONTAMINANTS**

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

AIR TOXICS MODELING PERFORMED*? X YES ___ NO

IDENTIFY THE AIR CONTAMINANTS: Xylene