John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

72/9/2015

Certified Mail

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

DANIEL NAYDER
REPUBLIC POWDERED METALS
2628 PEARL RD
MEDINA, OH 44256

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1652050077
Permit Number: P0117904
Permit Type: Renewal
County: Medina

Dear Permit Holder:

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

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

How to appeal this permit

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

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

How to save money, reduce pollution and reduce energy consumption

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

How to give us feedback on your permitting experience

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

How to get an electronic copy of your permit

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

If you have any questions, please contact Akron Regional Air Quality Management District at (330)375-2480 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,

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

Cc: ARAQMD

Response to Comments

Facility ID:	1652050077
Facility Name:	REPUBLIC POWDERED METALS
Facility Description:	Paints and Allied Products.
Facility Address:	2628 PEARL RD Medina, OH 44256 Medina County
Permit:	P0117904, Permit-To-Install and Operate - Renewal
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the Medina County Gazette on 01/06/2015. The comment period ended on 02/05/2015.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

1. Topic: Short Term Allowable Emission Rate

a. Comment: The limitation of 8 lb/hr OC was removed from the terms and conditions of P024 - OB#4 Mixer, which we agree with. Yet, the 40 lb/day OC limitation remains in the terms and conditions. Should this 40 lb/day limitation also have been removed? This change, whatever is decided, should follow through and be consistent in P008/P009 - OB Filling Lines, and in P005/6/7 - OB #1, 2 and 3 Mixers terms and conditions since these units are essentially the same. The P008/P009 and P005/6/7 terms and conditions (see page 49 and 53) have the 8 lb/hr limitation left in the draft permit. We request that the 8 lb/hr, or more preferentially the 40 lb/day OC limitation, be removed in these permit terms and conditions. If removed, the removal of any tracking of hourly OC emissions line items are also requested.

It is understood a short term limitation may be required to be left in the permit. It is Tremco's preference that the 8 lb/hr OC limitation be left in, and the 40 lb/day OC limitation be removed.

b. Response: The limitations of 40 pounds per day of organic compounds and 7.3 tons per year were established under OAC rule 3745-31-05 and still remain as applicable requirements for emissions unit P024 (P0105698, issued final 1/12/10). The BAT limitations established for the other emissions units (P008/P009, and P005 – P007) do appear to be slightly different but they were each established on a case-by-case basis and still remain as applicable requirements.

2. Topic: Record Keeping Requirements

a. Comment: Is the term listed on page 37 for P025 for tracking daily cycle time needed (see paragraph d)(3)e.). If determined not to be, please remove.

b. Response: P025 has an OC emission limitation of 0.71 pound per hour. In order to demonstrate compliance with this limit, it appears that the batch cycle time should be tracked.

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
REPUBLIC POWDERED METALS

Facility ID:	1652050077
Permit Number:	P0117904
Permit Type:	Renewal
Issued:	2/9/2015
Effective:	2/9/2015
Expiration:	2/9/2020

Division of Air Pollution Control
Permit-to-Install and Operate
for
REPUBLIC POWDERED METALS

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Authorization

Facility ID:	1652050077
Application Number(s):	A0051647
Permit Number:	P0117904
Permit Description:	FEPTIO renewal of a facility consisting of a variety of emissions units associated with the manufacturing of solvent-based coatings, latex-based coatings, roof coatings, and waterproofing coatings.
Permit Type:	Renewal
Permit Fee:	$0.00
Issue Date:	2/9/2015
Effective Date:	2/9/2015
Expiration Date:	2/9/2020

Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

REPUBLIC POWDERED METALS
2628 PEARL RD
Medina, OH 44256

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

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

Akron Regional Air Quality Management District
1867 West Market St.
Akron, OH 44313
(330)375-2480

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director

Authorization (continued)

Permit Number: P0117904
Permit Description: FEPTIO renewal of a facility consisting of a variety of emissions units associated with the manufacturing of solvent-based coatings, latex-based coatings, roof coatings, and waterproofing coatings.

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

Emissions Unit ID:	**P011**
Company Equipment ID:	LBFILL#1
Superseded Permit Number:	P0105375
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P016**
Company Equipment ID:	Roof Coating #1
Superseded Permit Number:	P0105375
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P023**
Company Equipment ID:	TBS Process
Superseded Permit Number:	P0105375
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P024**
Company Equipment ID:	OB#4
Superseded Permit Number:	P0105698
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P025**
Company Equipment ID:	LT#1
Superseded Permit Number:	P0105698
General Permit Category and Type:	Not Applicable

Group Name: Latex-Based Mixers

Emissions Unit ID:	**P012**
Company Equipment ID:	LB#2
Superseded Permit Number:	P0105375
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P013**
Company Equipment ID:	LB#3
Superseded Permit Number:	P0105375
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P014**
Company Equipment ID:	LB#4
Superseded Permit Number:	P0105375
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P015**
Company Equipment ID:	LB#5
Superseded Permit Number:	P0105375
General Permit Category andType:	Not Applicable

Group Name: Oil-Based Filling Lines

Emissions Unit ID:	**P008**
Company Equipment ID:	OBFILL#1

Superseded Permit Number:	P0105375
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P009**
Company Equipment ID:	OBFILL#2
Superseded Permit Number:	P0105375
General Permit Category andType:	Not Applicable

Group Name: Oil-Based Mixers

Emissions Unit ID:	**P005**
Company Equipment ID:	OB#1
Superseded Permit Number:	P0105375
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P006**
Company Equipment ID:	OB#2
Superseded Permit Number:	P0105375
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P007**
Company Equipment ID:	OB#3
Superseded Permit Number:	P0105375
General Permit Category andType:	Not Applicable

Group Name: Roof Coating Mixers

Emissions Unit ID:	**P017**
Company Equipment ID:	Roof Coating #2
Superseded Permit Number:	P0105375
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P018**
Company Equipment ID:	Roof Coating #3
Superseded Permit Number:	P0105375
General Permit Category andType:	Not Applicable

A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

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

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

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

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

B. Facility-Wide Terms and Conditions

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

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

      (1) None.

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

      (1) None.

C. Emissions Unit Terms and Conditions

1. P011, LBFILL#1

Operations, Property and/or Equipment Description:

Latex-Based Filling Line #1

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

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

a. None.

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

a. All.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 1.1 pounds per hour, and 4.8 tons per year.
b.	OAC rule 3745-31-05(D)	Combined annual emissions from this facility (P005 – P009, P011 – P018, P023 – P025) shall not exceed 97.0 tons per year of volatile organic compounds (VOC), as a rolling, 12-month summation.

(2) Additional Terms and Conditions:

a. This facility has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the emissions, upon issuance of this permit.

b. The permittee shall include all OC in the calculation of VOC emissions. The permittee has requested this condition in order to streamline the record keeping requirements.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following for each and every batch filled:

a. The filling date and product identification number;

b. The number of gallons filled;

c. The paint density, in pounds per gallon;

d. The VOC content of each batch, as a weight fraction;

e. The filling running time, in hours;

f. The calculated VOC emission rate for each batched filled, i.e., (b)*(c)*(d)*(0.005), in pounds per day; and

g. The average hourly VOC emission rate, i.e., (the summation of (f) for all batched filled) / (e), in pounds per hour.

A filtration loss factor of 0.005 is used for the transfer of paint.

(2) The permittee shall calculate and record the daily VOC emission rate from this emissions unit in pounds per day, i.e., the summation of the VOC emissions from all batched filled each day.

(3) For each month, the permittee shall collect and record the monthly VOC emissions for each emissions unit, in tons.

(4) The permittee shall, on a monthly basis, calculate and record the rolling 12-month VOC emission rates for all emissions units at the facility, in tons.

e) Reporting Requirements

(1) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid

electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

(2) The permittee shall submit quarterly deviation (excursion) reports that identify:

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. 97.0 tons VOC per rolling, 12-month period (for entire facility)

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

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

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

(3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) Testing Requirements

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

a. Emission Limitations:

1.1 pounds per hour, and 4.8 tons per year OC

Applicable Compliance Methods:

The permittee shall demonstrate compliance with the above hourly OC emission limitation based upon the record keeping requirements of d)(1)

The annual emission limitation was developed by multiplying the hourly mass emission limitation by 8760 hours per year, and then dividing by 2000.

Therefore, compliance with the annual limitation shall be demonstrated if compliance with the hourly limitation is maintained.

b. Emission Limitations:

97.0 tons per year of VOC for entire facility, as a rolling, 12-month summation.

Applicable Compliance Methods:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements in d)(3) and d)(4).

(2) Formulation data or USEPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the organic compound contents of the coatings and inks.

g) Miscellaneous Requirements

(1) None.

2. P016, Roof Coating #1

Operations, Property and/or Equipment Description:

Roof Coating Mixer #1

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

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

a. None.

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

a. All.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
b.	OAC rule 3745-17-11(B)	PE shall not exceed 0.843 pounds per hour. (based on 189 pounds/hour maximum process weight rate)
d.	OAC rule 3745-31-05(D)	Combined annual emissions from this facility (P005 – P009, P011 – P018, P023 – P025) shall not exceed 97.0 tons per year of volatile organic compounds (VOC), as a rolling, 12-month summation.

(2) Additional Terms and Conditions

a. This facility has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the emissions, upon issuance of this permit.

b. The permittee shall include all OC in the calculation of VOC emissions. The permittee has requested this condition in order to streamline the record keeping requirements.

c. The emissions from this emissions unit shall be vented to the baghouse at all times the emissions unit is in operation.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the baghouse is between 0.5 to 7 inches of water.

(2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit,the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

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

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was a deviation;

j. the pressure drop readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

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

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of anadministrative modification.

(3) The permittee shall collect and record the following information for each and every day of production:

a. The production date and identification number of each batch produced;

b. The batch size, in gallons;

c. The batch density, in pounds per gallon;

d. The VOC content of each batch, in weight percent;

e. The daily cycle time for the emissions unit, in hours; and

f. The daily VOC emission rate, in pounds per day, i.e., the summation of the emissions from each batch produced that day.

VOC emissions shall be calculated based upon the methodology specified in section f)(2) below.

(4) For each month, the permittee shall collect and record the monthly VOC emissions for each emissions unit, in tons.

(5) The permittee shall, on a monthly basis, calculate and record the rolling 12-month VOC emission rates for all emissions units at the facility, in tons.

e) Reporting Requirements

(1) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio

EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

(2) The permittee shall submit quarterly deviation (excursion) reports that identify:

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. 97.0 tons VOC per rolling, 12-month(for entire facility).

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

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

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

(3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

(4) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the baghouse during the 12-month reporting period for this/these emissions unit(s):

a. each period of time (start time and date, and end time and date)when the pressure drop across the baghouse was outside of the acceptable range;

b. any period of time (start time and date, and end time and date)when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse;

c. each incident of deviation described in “a” (above) where a prompt investigation was not conducted;

d. each incident of deviation described in “a” where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. each incident of deviation described in “a” where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

f) Testing Requirements

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

a. Emission Limitations:

Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Methods:

If required, compliance with the visible PE limitation shall be demonstrated through the results of visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

b. Emission Limitations:

0.843 pounds per hour PE

Applicable Compliance Methods:

If required, compliance shall be determined by the results of emission testing in accordance with Methods 1-5, of 40 CFR Part 60, Appendix A.

c. Emission Limitations:

97.0 tons per year of VOC for entire facility, as a rolling, 12-month summation.

Applicable Compliance Methods:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of d)(4) and d)(5).

(2) VOC emissions shall be calculated in accordance with the following equations:

Daily VOC Emissions = [Summation of (Size * Density * Weight Fraction * EF * (1-CF)) for all batched produced during the day]

Where:

Daily VOC Emissions = VOC emission rate for the day's production, in pounds per day;

Size = batch size, in gallons;

Density = batch density, in pounds per gallon;

Weight Fraction = VOC content of each batch, as a weight fraction;

EF = solvent loss emission factor (AP-42, Section 6.4), 0.015; and

CF = control factor (from Control of VOC Emissions from Ink and Paint Manufacturing Processes, USEPA-450/3-92-013, Section 4.2.1.1) of 0.40, based on the use of a cover for the tank.

(3) Formulation data or USEPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the OC contents of the cleanup materials, coatings, and inks.

g) Miscellaneous Requirements

(1) None.

3. P023, TBS Process

Operations, Property and/or Equipment Description:

TBS Process

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

(1) None.

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

(2) All.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 0.39 pounds per hour, and 1.70 tons per year. Particulate emissions (PE) shall not exceed 1.34 pounds per hour, and 5.86 tons per year. Visible PE shall not exceed 10% opacity as a 6-minute average.
b.	OAC rule 3745-17-07(A)	Less stringent than the limit established pursuant to OAC rule 3745-31-05.
c.	OAC rule 3745-17-11(B)	Less stringent than the limit established pursuant to OAC rule 3745-31-05.
d.	OAC rule 3745-31-05(D)	Combined annual emissions from this facility (P005 – P009, P011 – P018, P023 – P025) shall not exceed 97.0 tons per year of volatile organic compounds (VOC), as a rolling, 12-month summation.

(2) Additional Terms and Conditions

a. This facility has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the emissions, upon issuance of this permit.

b. The permittee shall include all OC in the calculation of VOC emissions. The permittee has requested this condition in order to streamline the record keeping requirements.

c. The emissions from this emissions unit shall be vented to the baghouse at all times the emissions unit is in operation.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the baghouse is between 0.5 to 7 inches of water.

(2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit,the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that

determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was a deviation;

j. the pressure drop readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

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

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

(3) The permittee shall collect and record the following information for each and every day of production:

a. The number of batches produced in this emissions unit;

b. The daily cycle time for the emissions unit, in hours; and

c. The hourly VOC emission rate, in pounds per hour.

VOC emissions shall be calculated based upon the methodology specified in section f)(1)c. below.

(4) For each month, the permittee shall collect and record the monthly VOC emissions for each emissions unit, in tons.

(5) The permittee shall, on a monthly basis, calculate and record the rolling 12-month VOC emission rates for all emissions units at the facility, in tons.

e) Reporting Requirements

(1) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio

EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

(2) The permittee shall submit quarterly deviation (excursion) reports that identify:

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. 97.0 tons VOC per rolling, 12-month(for entire facility).

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

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

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

(3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

(4) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the baghouse during the 12-month reporting period for this/these emissions unit(s):

a. each period of time (start time and date, and end time and date)when the pressure drop across the baghouse was outside of the acceptable range;

b. any period of time (start time and date, and end time and date)when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse;

c. each incident of deviation described in “a” (above) where a prompt investigation was not conducted;

d. each incident of deviation described in “a” where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. each incident of deviation described in “a” where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

f) Testing Requirements

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

a. Emission Limitations:

Visible PE shall not exceed 10% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Methods:

If required, compliance with the visible PE limitation shall be demonstrated through the results of visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

b. Emission Limitations:

1.34 pounds per hour PE, and 5.86 tons per year

Applicable Compliance Methods:

If required, compliance with the hourly limitation shall be determined by the results of emission testing in accordance with Methods 1 – 5 of 40 CFR Part 60, Appendix A.

The annual emission limitation was established by multiplying the hourly limitation by 8760, and then dividing by 2000. Therefore, as long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be demonstrated.

c. Emission Limitations:

0.39 lbs/hr OC, and 1.70 tons/year OC

Applicable Compliance Methods:

Compliance with the hourly emission limitation can be demonstrated by calculations representing the worst-case potential to emit.

Maximum Process Operation	Emission factor (# OC/batch)
Filling to TBS01	0.32
Packaging from TBS02	0.32
Filling TT from AST17	0.38
Filling TT from AST18	0.38
Total	1.4

Emission factors based on working/breathing losses from filling of tanks and based on USEPA Tanks 4.0 program with all emissions being composed of mineral spirits. Calculation results in hourly emission as worst case batch time submitted of 1 hour. Thus, maximum hourly potential to emit is 1.4 lbs/hr OC.

The annual emission limitation was established by multiplying the hourly limitation by 8760, and then dividing by 2000. Therefore, as long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be demonstrated.

d. Emission Limitations:

97.0 tons per year of VOC for entire facility, as a rolling, 12-month summation.

Applicable Compliance Methods:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements in d)(4) and d)(5).

g) Miscellaneous Requirements

(1) None.

4. P024, OB#4

Operations, Property and/or Equipment Description:

Oil-Based Mixer #4

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

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

a. None.

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

a. All.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Organic compounds (OC) emissions from this emissions unit shall not exceed 40.0 pounds per day, and 7.3 tons per year.
b.	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
c.	OAC rule 3745-17-11(B)	PE shall not exceed 1.83 pounds per hour. (based on 600 pounds/hour maximum process weight rate)
d.	OAC rule 3745-31-05(D)	Combined annual emissions from this facility (emissions units P005 – P009, P011 – P018, P023 – P025) shall not exceed 97.0 tons per year of volatile organic compounds (VOC), as a rolling, 12-month summation.

(2) Additional Terms and Conditions

a. This facility has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the emissions, upon issuance of this permit.

b. The permittee shall include all OC in the calculation of VOC emissions. The permittee has requested this condition in order to streamline the record keeping requirements.

c. The emissions from this emissions unit shall be vented to the baghouse at all times the emissions unit is in operation.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the baghouse is between 0.5 to 7 inches of water.

(2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit,the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that

determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was a deviation;

j. the pressure drop readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

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

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of anadministrative modification.

(3) The permittee shall collect and record the following information for each and every day of production:

a. The production date and identification number of each batch produced;

b. The batch size, in gallons;

c. The batch density, in pounds per gallon;

d. The VOC content of each batch, in weight percent;

e. The daily cycle time for the emissions unit, in hours; and

f. The daily VOC emission rate, in pounds per day, i.e., the summation of the emissions from each batch produced that day.

VOC emissions shall be calculated based upon the methodology specified in sections f)(1)c below.

(4) For each month, the permittee shall collect and record the monthly VOC emissions for each emissions unit, in tons.

(5) The permittee shall, on a monthly basis, calculate and record the rolling, 12-month VOC emission rates for all the emissions units at the facility, in tons.

e) Reporting Requirements

(1) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

(2) The permittee shall submit quarterly deviation (excursion) reports that identify:

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. 97.0 tons VOC per rolling, 12-month(for entire facility).

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

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

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

(3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

(4) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the baghouse during the 12-month reporting period for this/these emissions unit(s):

a. each period of time (start time and date, and end time and date)when the pressure drop across the baghouse was outside of the acceptable range;

b. any period of time (start time and date, and end time and date)when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse;

c. each incident of deviation described in “a” (above) where a prompt investigation was not conducted;

d. each incident of deviation described in “a” where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. each incident of deviation described in “a” where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

f) Testing Requirements

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

a. Emission Limitations:

The visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Methods:

If required, compliance with the visible PE limitation shall be demonstrated through the results of visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

b. Emission Limitations:

1.83 lbs/hr PE

Applicable Compliance Methods:

If required, compliance with the hourly limitation shall be determined by the results of emission testing in accordance with Methods 1 – 5 of 40 CFR Part 60, Appendix A.

c. Emission Limitations:

40.0 lbs/day and 7.3 tons per year of OC

Applicable Compliance Methods:

The permittee shall demonstrate compliance with the daily limit based upon the record keeping requirements of section d)(3).

Formulation data or USEPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the OC contents of the cleanup materials, coatings, and inks.

Daily emissions shall be calculated in accordance with the following equations:

Daily VOC Emissions = [Summation of (Size * Density * Weight Fraction * EF * (1-CF)) for all batched produced during the day]

Where:

Daily VOC Emissions = VOC emission rate for the day's production, in pounds per day;

Size = batch size, in gallons;

Density = batch density, in pounds per gallon;

Weight Fraction = VOC content of each batch, as a weight fraction;

EF = solvent loss emission factor (AP-42, Section 6.4), 0.015; and

CF = control factor (from Control of VOC Emissions from Ink and Paint Manufacturing Processes, USEPA-450/3-92-013, Section 4.2.1.1) of 0.40, based on the use of a cover for the tank.

The annual emission limitation was established by multiplying the daily limitation by 365 days per year, and then dividing by 2000. Therefore, as long as compliance with the daily limitation is maintained, compliance with the annual limitation shall be demonstrated.

d. Emission Limitations:

97.0 tons per year of VOC for the entire facility, as a rolling, 12-month summation.

Applicable Compliance Methods:

The permittee shall demonstrate compliance with the rolling 12-month summation VOC limitation above based upon the record keeping requirements in d)(4) and d)(5).

g) Miscellaneous Requirements

(1) None.

5. P025, LT#1

Operations, Property and/or Equipment Description:

Latex-Based Mixer #1

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

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

a. None.

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

a. All.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Visible particulate emissions (PE) shall not exceed 5% opacity, as a 6-minute average. PE shall not exceed 1.95 pounds per hour, and 8.54 tons per year (based on 660 pounds per hour maximum process weight rate). Organic compounds (OC) shall not exceed 0.71 pound per hour, and 3.1 tons per year.
b.	OAC rule 3745-17-07(A)	The emission limitation based on this rule is less stringent than the limit established pursuant to OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-17-11(B)	The emission limitation based on this rule is less stringent than the limit established pursuant to OAC rule 3745-31-05(A)(3).
d.	OAC rule 3745-31-05(D)	Combined annual emissions from this

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		facility (P005 – P009, P011 – P018, P023 – P025) shall not exceed 97.0 tons per year of volatile organic compounds (VOC), as a rolling, 12-month summation.

(2) Additional Terms and Conditions

a. This facility has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the emissions, upon issuance of this permit.

b. The permittee shall include all OC in the calculation of VOC emissions. The permittee has requested this condition in order to streamline the record keeping requirements.

c. The emissions from this emissions unit shall be vented to the baghouse at all times the emissions unit is in operation.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the baghouse is between 0.5 to 7 inches of water.

(2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit,the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

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

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was a deviation;

j. the pressure drop readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

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

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of anadministrative modification.

(3) The permittee shall collect and record the following information for each and every day of production:

a. The production date and identification number of each batch produced;

b. The batch size, in gallons;

c. The batch density, in pounds per gallon;

d. The VOC content of each batch, in weight percent;

e. The daily cycle time for the emissions unit, in hours;

f. The daily VOC emission rate, in pounds per day, i.e., the summation of the emissions from each batch produced that day; and

g. The calculated average hourly VOC emission rate for the daily production of VOC per hour (average).

VOC emissions shall be calculated based upon the methodology specified in sections f)(1)c below.

(4) For each month, the permittee shall collect and record the monthly VOC emissions for each emissions unit, in tons.

(5) The permittee shall, on a monthly basis, calculate and record the rolling, 12-month VOC emission rates for all the emissions units at the facility, in tons.

e) Reporting Requirements

(1) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

(2) The permittee shall submit quarterly deviation (excursion) reports that identify:

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. 97.0 tons VOC per rolling, 12-month(for entire facility).

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

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

The quarterly reports shall be submitted,electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to

March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

(3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

(4) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the baghouse during the 12-month reporting period for this/these emissions unit(s):

a. each period of time (start time and date, and end time and date)when the pressure drop across the baghouse was outside of the acceptable range;

b. any period of time (start time and date, and end time and date)when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse;

c. each incident of deviation described in “a” (above) where a prompt investigation was not conducted;

d. each incident of deviation described in “a” where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. each incident of deviation described in “a” where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

f) Testing Requirements

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

a. Emission Limitations:

Visible particulate emissions shall not exceed 5% opacity, as a 6-minute average.

Applicable Compliance Methods:

If required, compliance with the visible PE limitation shall be demonstrated through the results of visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

b. Emission Limitations:

1.95 lbs/hr and 8.54 tons/yr PE

Applicable Compliance Methods:

If required, compliance with the hourly limitation shall be determined by the results of emission testing in accordance with Methods 1 – 5 of 40 CFR Part 60, Appendix A.

The annual emission limitation was developed by multiplying the hourly mass emission limitation by 8760 hours per year, and then dividing by. Therefore, compliance with the annual limitation shall be demonstratedif compliance with the hourly limitation is maintained.

c. Emission Limitations:

0.71 lbs/hr OC, and 3.1 ton per year

Applicable Compliance Methods:

The permittee shall demonstrate compliance with the hourly limitation based upon the record keeping requirements of section d)(3).

Formulation data or USEPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the OC contents of the cleanup materials, coatings, and inks.

Hourly emissions shall be calculated in accordance with the following equations:

Hourly VOC emissions = Daily VOC emissions / Time

Where:

Time = total daily production time, in hours.

Daily VOC Emissions = [Summation of (Size * Density * Weight Fraction * EF * (1-CF)) for all batched produced during the day]

Where:

Daily VOC Emissions = VOC emission rate for the day's production, in pounds per day;

Size = batch size, in gallons;

Density = batch density, in pounds per gallon;

Weight Fraction = VOC content of each batch, as a weight fraction;

EF = solvent loss emission factor (AP-42, Section 6.4), 0.015; and

CF = control factor (from Control of VOC Emissions from Ink and Paint Manufacturing Processes, USEPA-450/3-92-013, Section 4.2.1.1) of 0.40, based on the use of a cover for the tank.

The annual emission limitation was developed by multiplying the hourly mass emission limitation by 8760 hours per year, and then dividing by. Therefore, compliance with the annual limitation shall be demonstratedif compliance with the hourly limitation is maintained.

d. Emission Limitations:

97.0 tons per year of VOC for entire facility, as a rolling, 12-month summation.

Applicable Compliance Methods:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of d)(4) and d)(5).

g) Miscellaneous Requirements

(1) None.

6. Emissions Unit Group -Latex-Based Mixers: P012,P013,P014,P015,

EU ID	Operations, Property and/or Equipment Description
P012	Latex-Based Mixer #2
P013	Latex-Based Mixer #3
P014	Latex-Based Mixer #4
P015	Latex-Based Mixer #5

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

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

a. None.

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

a. All.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Visible particulate emissions (PE) shall not exceed 5% opacity as a 6-minute average. Organic compound emissions shall not exceed 1.01 pounds per hour, and 4.42 tons per year. Particulate emissions shall not exceed 1.95 pounds per hour, and 8.54 tons per year. (based on 660 pounds/hour maximum process weight rate)
b.	OAC rule 3745-17-07(A)	The VE limitation based on this rule is less stringent than the limit established pursuant to OAC rule 3745-31-05.
c.	OAC rule 3745-17-11(B)	The PE limitation based on this rule is

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		less stringent than the limit established pursuant to OAC rule 3745-31-05.
d.	OAC rule 3745-31-05(D)	Combined annual emissions from this facility (P005 – P009, P011 – P018, P023 – P025) shall not exceed 97.0 tons per year of volatile organic compounds (VOC), as a rolling, 12-month summation.

(2) Additional Terms and Conditions

a. This facility has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the emissions, upon issuance of this permit.

b. The permittee shall include all OC in the calculation of VOC emissions. The permittee has requested this condition in order to streamline the record keeping requirements.

c. The emissions from this emissions unit shall be vented to the baghouse at all times the emissions unit is in operation.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the baghouse is between 0.5 to 7 inches of water.

(2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit,the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

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

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was a deviation;

j. the pressure drop readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

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

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

(3) The permittee shall collect and record the following information for each and every day of production:

a. The production date and identification number of each batch produced;

b. The batch size, in gallons;

c. The batch density, in pounds per gallon;

d. The VOC content of each batch, in weight percent;

e. The daily cycle time for the emissions unit, in hours;

f. The daily VOC emission rate, in pounds per day, i.e., the summation of the emissions from each batch produced that day; and

g. The calculated average hourly VOC emission rate for the daily production of VOC per hour (average).

VOC emissions shall be calculated based upon the methodology specified in sections f)(1)c below.

(4) For each month, the permittee shall collect and record the monthly VOC emissions for each emissions unit, in tons.

(5) The permittee shall, on a monthly basis, calculate and record the rolling 12-month VOC emission rates for all emissions units at the facility, in tons.

e) Reporting Requirements

(1) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

(2) The permittee shall submit quarterly deviation (excursion) reports that identify:

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. 97.0 tons VOC per rolling, 12-month(for entire facility).

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

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

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

(3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

(4) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the baghouse during the 12-month reporting period for this/these emissions unit(s):

a. each period of time (start time and date, and end time and date)when the pressure drop across the baghouse was outside of the acceptable range;

b. any period of time (start time and date, and end time and date)when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse;

c. each incident of deviation described in “a” (above) where a prompt investigation was not conducted;

d. each incident of deviation described in “a” where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. eachincident of deviation described in “a” where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

f) Testing Requirements

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

a. Emission Limitations:

Visible PE shall not exceed 5% opacity, as a 6-minute average.

Applicable Compliance Methods:

If required, compliance with the visible PE limitation shall be demonstrated through the results of visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

b. Emission Limitations:

1.95 lbs/hr PE, and 8.54 tons per year

Applicable Compliance Methods:

If required, compliance with the hourly limitation shall be determined by the results of emission testing in accordance with Methods 1 – 5 of 40 CFR Part 60, Appendix A.

The annual emission limitation was developed by multiplying the hourly mass emission limitation by 8760 hours per year and dividing by 2000 to convert to tons. Therefore, compliance with the annual limitation will be demonstrated if compliance with the hourly limitation is maintained.

c. Emission Limitations:

1.01 lbs/hr OC, and 4.42 tons per year

Applicable Compliance Methods:

The permittee shall demonstrate compliance with the hourly limitation based upon the record keeping requirements in d)(3).

Hourly emissions shall be calculated in accordance with the following equations:

Hourly VOC emissions = Daily VOC emissions / Time

Where:

Time = total daily production time, in hours.

Daily VOC Emissions = [Summation of (Size * Density * Weight Fraction * EF * (1-CF)) for all batched produced during the day]

Where:

Daily VOC Emissions = VOC emission rate for the day's production, in pounds per day;

Size = batch size, in gallons;

Density = batch density, in pounds per gallon;

Weight Fraction = VOC content of each batch, as a weight fraction;

EF = solvent loss emission factor (AP-42, Section 6.4), 0.015; and

CF = control factor (from Control of VOC Emissions from Ink and Paint Manufacturing Processes, USEPA-450/3-92-013, Section 4.2.1.1) of 0.40, based on the use of a cover for the tank.

The annual emission limitation was developed by multiplying the hourly mass emission limitation by 8760 hours per year and dividing by 2000 to convert to tons. Therefore, compliance with the annual limitation will be demonstratedif compliance with the hourly limitation is maintained.

d. Emission Limitations:

97.0 tons per year of VOC for entire facility, as a rolling, 12-month summation.

Applicable Compliance Methods:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements in d)(4) and d)(5).

(2) Formulation data or USEPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the OC contents of the cleanup materials, coatings, and inks

g) Miscellaneous Requirements

(1) None.

7. Emissions Unit Group -Oil-Based Filling Lines: P008,P009,

EU ID	Operations, Property and/or Equipment Description
P008	Oil-Based Filling Line #1
P009	Oil-Based Filling Line #2

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

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

a. None.

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

a. All.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 8.0 pounds per hour, 40.0 pounds per day, and 7.3 tons per year.
b.	OAC rule 3745-31-05(D)	Combined annual emissions from this facility (P005 – P009, P011 – P018, P023 – P025) shall not exceed 97.0 tons per year of volatile organic compounds (VOC), as a rolling, 12-month summation.

(2) Additional Terms and Conditions

a. This facility has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the emissions, upon issuance of this permit.

b. The permittee shall include all OC in the calculation of VOC emissions. The permittee has requested this condition in order to streamline the record keeping requirements.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following for each and every batch filled:

a. The filling date and ticket identification number;

b. The number of gallons filled;

c. The paint density, in pounds per gallon;

d. The VOC content of each batch, as a weight fraction;

e. The filling running time, in hours;

f. The calculated VOC emission rate for each batched filled, i.e., (b)*(c)*(d)*(0.005), in pounds per day; and

g. The average hourly VOC emission rate, i.e., (the summation of (f) for all batched filled) / (e), in pounds per hour.

A filtration loss factor of 0.005 is used for the transfer of paint.

(2) The permittee shall calculate and record the daily VOC emission rate from this emissions unit in pounds per day, i.e., the summation of the VOC emissions from all batched filled each day.

(3) For each month, the permittee shall collect and record the monthly VOC emissions for each emissions unit, in tons.

(4) The permittee shall, on a monthly basis, calculate and record the rolling 12-month VOC emission rates for all emissions units at the facility, in tons.

e) Reporting Requirements

(1) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District

Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

(2) The permittee shall submit quarterly deviation (excursion) reports that identify:

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. 97.0 tons VOC per rolling, 12-month(for entire facility).

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

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

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

(3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) Testing Requirements

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

a. Emission Limitations:

8.0 lbs/hr OC, 40 lbs/day, 7.3 tons/year

Applicable Compliance Methods:

The permittee shall demonstrate compliance with the above hourly and daily limitations based upon the record keeping requirements in d)(1) and d)(2).

The annual emission limitation was developed by multiplying the daily mass emission limitation by 365 days per year and dividing by 2000 to convert to tons. Therefore, compliance with the annual limitation will be demonstratedif compliance with the daily limitation is maintained.

b. Emission Limitations:

97.0 tons per year of VOC for entire facility, as a rolling, 12-month summation.

Applicable Compliance Methods:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of d)(3) and d)(4).

(2) Formulation data or USEPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the organic compound contents of the coatings and inks.

g) Miscellaneous Requirements

(1) None.

8. Emissions Unit Group -Oil-Based Mixers: P005,P006,P007,

EU ID	Operations, Property and/or Equipment Description
P005	Oil-Based Mixer #1
P006	Oil-Based Mixer #2
P007	Oil-Based Mixer #3

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

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

a. None.

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

a. All.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Visible particulate emissions (PE) shall not exceed 5% opacity, as a 6-minute average. Organic compound (OC) emissions shall not exceed 8.0 pounds per hour, 40.0 pounds per day, and 7.3 tons per year. Particulate emissions shall not exceed 1.83 pounds per hour, and 8.02 tons per year. (based on 600 pounds/hr process weight rate) (P005 and P006) Particulate emissions shall not exceed 0.67 pounds per hour, and 2.95 tons per year. (based on 135 pounds/hr process weight rate) (P007)

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-17-07(A)	The emission limitation based on this rule is less stringent than the limit established pursuant to OAC rule 3745-31-05.
c.	OAC rule 3745-17-11(B)	The emission limitation based on this rule is less stringent than the limit established pursuant to OAC rule 3745-31-05.
d.	OAC rule 3745-31-05(D)	Combined annual emissions from this facility (P005 – P009, P011 – P018, P023 – P025) shall not exceed 97.0 tons per year of volatile organic compounds (VOC), as a rolling, 12-month summation.

(2) Additional Terms and Conditions

a. This facility has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the emissions, upon issuance of this permit.

b. The permittee shall include all OC in the calculation of VOC emissions. The permittee has requested this condition in order to streamline the record keeping requirements.

c. The emissions from this emissions unit shall be vented to the baghouse at all times the emissions unit is in operation.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the baghouse is between 0.5 to 7 inches of water.

(2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit,the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

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

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was a deviation;

j. the pressure drop readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

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

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

(3) The permittee shall collect and record the following information for each and every day of production:

a. The production date and identification number of each batch produced;

b. The batch size, in gallons;

c. The batch density, in pounds per gallon;

d. The VOC content of each batch, in weight percent;

e. The daily cycle time for the emissions unit, in hours;

f. The daily VOC emission rate, in pounds per day, i.e., the summation of the emissions from each batch produced that day; and

g. The calculated average hourly VOC emission rate for the daily production of VOC per hour (average).

VOC emissions shall be calculated based upon the methodology specified in sections f)(1)c below.

(4) For each month, the permittee shall collect and record the monthly VOC emissions for each emissions unit, in tons.

(5) The permittee shall, on a monthly basis, calculate and record the rolling 12-month VOC emission rates for all emissions units at the facility, in tons.

e) Reporting Requirements

(1) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

(2) The permittee shall submit quarterly deviation (excursion) reports that identify:

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. 97.0 tons VOC per rolling, 12-month(for entire facility).

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

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

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

(3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

(4) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the baghouse during the 12-month reporting period for this/these emissions unit(s):

a. each period of time (start time and date, and end time and date)when the pressure drop across the baghouse was outside of the acceptable range;

b. any period of time (start time and date, and end time and date)when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse;

c. each incident of deviation described in “a” (above) where a prompt investigation was not conducted;

d. each incident of deviation described in “a” where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. eachincident of deviation described in “a” where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

f) Testing Requirements

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

a. Emission Limitations:

Visible PE shall not exceed 5% opacity, as a 6-minute average.

Applicable Compliance Methods:

If required, compliance with the visible PE limitation shall be demonstrated through the results of visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

b. Emission Limitations:

1.83 lbs/hr PE, and 8.01 tons per year (P005 and P006)

0.67 lbs/hr PE and 2.95 tons per year (P007)

Applicable Compliance Methods:

If required, compliance with the hourly limitation shall be determined by the results of emission testing in accordance with Methods 1 – 5 of 40 CFR Part 60, Appendix A.

The annual emission limitation was developed by multiplying the hourly mass emission limitation by 8760 hours per year and dividing by 2000 to convert to tons. Therefore, compliance with the annual limitation will be demonstratedif compliance with the hourly limitation is maintained.

c. Emission Limitations:

8.0 lbs/hr OC, 40.0 lbs/day, and 7.3 tons per year

Applicable Compliance Methods:

The permittee shall demonstrate compliance with the OC emission limitations based upon the record keeping requirements in section d)(3).

Daily and hourly emissions shall be calculated in accordance with the following equations:

Daily VOC Emissions = [Summation of (Size * Density * Weight Fraction * EF * (1-CF)) for all batched produced during the day]

Where:

Daily VOC Emissions = VOC emission rate for the day's production, in pounds per day;

Size = batch size, in gallons;

Density = batch density, in pounds per gallon;

Weight Fraction = VOC content of each batch, as a weight fraction;

EF = solvent loss emission factor (AP-42, Section 6.4), 0.015; and

CF = control factor (from Control of VOC Emissions from Ink and Paint Manufacturing Processes, USEPA-450/3-92-013, Section 4.2.1.1) of 0.40, based on the use of a cover for the tank.

Hourly VOC emissions = Daily VOC emissions / Time

Where:

Time = total daily production time, in hours.

The annual emission limitation was developed by multiplying the daily mass emission limitation by 365 days per year and dividing by 2000 to convert to tons. Therefore, compliance with the annual limitation will be demonstratedif compliance with the daily limitation is maintained.

d. Emission Limitations:

97.0 tons per year of VOC for entire facility, as a rolling, 12-month summation.

Applicable Compliance Methods:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of d)(4) and d)(5).

(2) Formulation data or USEPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the OC contents of the cleanup materials, coatings, and inks.

g) Miscellaneous Requirements

(1) None.

9. Emissions Unit Group -Roof Coating Mixers: P017,P018,

EU ID	Operations, Property and/or Equipment Description
P017	Roof Coating Mixer #2
P018	Roof Coating Mixer #3

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

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

a. None.

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

a. All.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20%, as a 6-minute average, except as provided by rule.
b.	OAC rule 3745-17-11(B)	PE shall not exceed 1.24 pounds per hour. (based on 336 pounds/hr maximum process weight rate)
c.	OAC rule 3745-31-05(D)	Combined annual emissions from this facility (P005 – P009, P011 – P018, P023 – P025) shall not exceed 97.0 tons per year of volatile organic compounds (VOC), as a rolling, 12-month summation.

(2) Additional Terms and Conditions

a. This facility has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the emissions, upon issuance of this permit.

b. The permittee shall include all OC in the calculation of VOC emissions. The permittee has requested this condition in order to streamline the record keeping requirements.

c. The emissions from this emissions unit shall be vented to the baghouse at all times the emissions unit is in operation.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the baghouse is between 0.5 to 7 inches of water.

(2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit,the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that

determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was a deviation;

j. the pressure drop readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

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

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

(3) The permittee shall collect and record the following information for each and every day of production:

a. The production date and identification number of each batch produced;

b. The batch size, in gallons;

c. The batch density, in pounds per gallon;

d. The VOC content of each batch, in weight percent;

e. The daily cycle time for the emissions unit, in hours; and

f. The daily VOC emission rate, in pounds per day, i.e., the summation of the emissions from each batch produced that day.

VOC emissions shall be calculated based upon the methodology specified in sections f)(2) below.

(4) For each month, the permittee shall collect and record the monthly VOC emissions for each emissions unit, in tons.

(5) The permittee shall, on a monthly basis, calculate and record the rolling 12-month VOC emission rates for all emissions units at the facility, in tons.

e) Reporting Requirements

(1) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

(2) The permittee shall submit quarterly deviation (excursion) reports that identify:

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. 97.0 tons VOC per rolling, 12-month(for entire facility).

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

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

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

(3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

(4) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the baghouse during the 12-month reporting period for this/these emissions unit(s):

a. each period of time (start time and date, and end time and date)when the pressure drop across the baghouse was outside of the acceptable range;

b. any period of time (start time and date, and end time and date)when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse;

c. each incident of deviation described in “a” (above) where a prompt investigation was not conducted;

d. each incident of deviation described in “a” where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. eachincident of deviation described in “a” where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

f) Testing Requirements

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

a. Emission Limitations:

Visible PE shall not exceed 20% opacity, as a 6-minute average.

Applicable Compliance Methods:

If required, compliance with the visible PE limitation shall be demonstrated through the results of visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

b. Emission Limitations:

1.24 pounds per hour PE

Applicable Compliance Methods:

If required, compliance with the hourly limitation shall be determined by the results of emission testing in accordance with Methods 1 – 5 of 40 CFR Part 60, Appendix A.

c. Emission Limitations:

97.0 tons per year of VOC for entire facility, as a rolling, 12-month summation.

Applicable Compliance Methods:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements in d)(4) and d)(5).

(2) VOC emissions shall be calculated in accordance with the following equations:

Daily VOC Emissions = [Summation of (Size * Density * Weight Fraction * EF * (1-CF)) for all batched produced during the day]

Where:

Daily VOC Emissions = VOC emission rate for the day's production, in pounds per day;

Size = batch size, in gallons;

Density = batch density, in pounds per gallon;

Weight Fraction = VOC content of each batch, as a weight fraction;

EF = solvent loss emission factor (AP-42, Section 6.4), 0.015; and

CF = control factor (from Control of VOC Emissions from Ink and Paint Manufacturing Processes, USEPA-450/3-92-013, Section 4.2.1.1) of 0.40, based on the use of a cover for the tank.

(3) Formulation data or USEPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the OC contents of the cleanup materials, coatings, and inks.

g) Miscellaneous Requirements

(1) None.