Ohio Environmental Protection Agency

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

8/28/2015

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

Richard Fisher
Sherwin-Williams Company
145 CALDWELL DRIVE
Cincinnati, OH 45216

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

Facility ID: 1431431877
Permit Number: P0118892
Permit Type: Renewal
County: Hamilton

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO)for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, The Cincinnati Enquirer. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page,www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

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

and

Southwest Ohio Air Quality Agency
250 William Howard Taft Rd.
Cincinnati, OH 45219

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted.Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now.If you have any questions, please contact Southwest Ohio Air Quality Agency at (513)946-7777.

Sincerely,

Michael E. Hopkins, P.E.
Assistant Chief, Permitting Section, DAPC

Cc: U.S. EPA Region 5*Via E-Mail Notification*
SWOAQA; Indiana; Kentucky

PUBLIC NOTICE

The following matters are the subject of this public notice by the Ohio Environmental Protection Agency. The complete public notice, including any additional instructions for submitting comments, requesting information, a public hearing, or filing an appeal may be obtained at:http://epa.ohio.gov/actions.aspx or Hearing Clerk, Ohio EPA, 50 W. Town St., Columbus, Ohio 43215. Ph: 614-644-2129 email:HClerk@epa.ohio.gov

Draft Air Pollution Permit-to-Install and Operate Renewal
Sherwin-Williams Company
145 CALDWELL DRIVE,, Cincinnati, OH 45216
ID#:P0118892
Date of Action: 8/28/2015
Permit Desc:FEPTIO renewal of emissions units P026 and P027 Schold mixers..
The permit and complete instructions for requesting information or submitting comments may be obtained at: http://epa.ohio.gov/dapc/permitsonline.aspx by entering the ID # or: Bonnie Pray, Southwest Ohio Air Quality Agency, 250 William Howard Taft Rd., Cincinnati, OH 45219. Ph: (513)946-7777

Permit Strategy Write-Up

1. Check all that apply:

   _X_ Synthetic Minor Determination

   Netting Determination

2. Source Description:

   Sherwin-Williams is a synthetic minor facility located in Hamilton County. The facility manufactures paint and coating products.

3. Facility Emissions and Attainment Status:

   Sherwin-Williams is a synthetic minor facility located in Hamilton County, Ohio which is in attainment for all criteria pollutants except ozone (volatile organic compounds are a precursor of ozone)and particulate matter 2.5 microns or less in diameter (PM2.5).

   This permit-to-install and operate (PTIO) permitting action is for the renewal of two Schold mixers and associated tubs.

4. Source Emissions:

   The facility employs formulas for mixes that contain acetone as well as formulas for mixes that do not contain acetone and therefore have both organic compound (OC) and volatile organic compound (VOC) emissions. The facility-wide potential to emit for OC emissions is 198.9 tons per year (TPY) and for VOC emissions is 90.3 TPY based upon the issuance of permits over the years which in some cases were issued as direct finals which might not necessarily contain federally enforceable terms and conditions. Previously, the facility used Engineering Guide #61 as an exemption for Title V status as their actual emissions have been continuously less than 20% of the Title V emission threshold levels.

   The purpose of this synthetic minor PTIO renewal permitting action along with other PTIO renewals being processed at this time is to memorialize all the individual permitting actions that have occurred at this facility over the years to ensure that the facility has acceptable federally enforceable terms and conditions restricting VOC emissions to below both Title V and non-attainment review emission levels to less than 100 TPY thereby avoiding both those regulations.

5. Conclusion:

   The federally enforceable terms and conditions of the PTIO renewal of all their existing permits will assure that the Sherwin-Williams' facility will remain in compliance with the applicable emission limitations set forth in this PTIO renewal along with other PTIO renewals being processed at this time to ensure that the facility will not exceed Title V and non-attainment emission threshold for levels for VOC and thereby not triggering either one of those permitting requirements. This PTIO renewal includes record keeping and reporting requirements as well emission compliance demonstration requirements which will allow the facility to determine compliance with the synthetic minor limitations contained with this PTIO renewal.

6. Please provide additional notes or comments as necessary:

   In addition, this PTIO renewal will incorporate Ohio Senate Bill 265 provisions with regard to how Ohio characterizes Best Available Technology (BAT) in their air PTIOs pursuant to a February 7, 2014, office memo by Mike Hopkins titled "BAT Requirements for Permits issued On or After February 7, 2014" and associated Ohio's Engineering Guide #87 requirements that were not incorporated at the time of issuance of some of the facility's air permits.

   With all the above changes, Ohio EPA felt it necessary to issue this PTIO renewal in draft to secure both the facility and U.S.EPA's comments with regard to those changes.

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

Pollutant	Tons Per Year
OC	36
VOC*	90.3
PE	4.3

*Facility-wide basis as listed in Section B of the terms and conditions of this permit renewal.

DRAFT

Division of Air Pollution Control
Permit-to-Install and Operate
for
Sherwin-Williams Company

Facility ID:	1431431877
Permit Number:	P0118892
Permit Type:	Renewal
Issued:	8/28/2015
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
Sherwin-Williams Company

Table of Contents

Authorization 1

A. Standard Terms and Conditions 3

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

B. Facility-Wide Terms and Conditions 8

C. Emissions Unit Terms and Conditions 13

1. P026, High speed schold mixer 14
2. P027, High speed schold mixer 24

Authorization

Facility ID:	1431431877
Application Number(s):	A0053289
Permit Number:	P0118892
Permit Description:	FEPTIO renewal of emissions units P026 and P027 Schold mixers.
Permit Type:	Renewal
Permit Fee:	$0.00*DO NOT send payment at this time, subject to change before final issuance*
Issue Date:	8/28/2015
Effective Date:	To be entered upon final issuance
Expiration Date:	To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date:	To be entered upon final issuance

This document constitutes issuance to:

Sherwin-Williams Company
145 CALDWELL DRIVE
Cincinnati, OH 45216

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:

Southwest Ohio Air Quality Agency
250 William Howard Taft Rd.
Cincinnati, OH 45219
(513)946-7777

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: P0118892
Permit Description: FEPTIO renewal of emissions units P026 and P027 Schold mixers.

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

Emissions Unit ID:	**P026**
Company Equipment ID:	High speed schold mixer
Superseded Permit Number:	P0111907
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P027**
Company Equipment ID:	High speed schold mixer
Superseded Permit Number:	P0111907
General Permit Category and Type:	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 Southwest Ohio Air Quality Agency 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) Sections B.2 thru B.8.

2. The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units P006 (Shar Mixer), P008 (Hockmeyer Mixer 2), P017 (Hardener Tank), P021 (Tinting Area), P026 (Schold Mixer1), P027 (Schold Mixer 2), P028 (Myers Mixer), P029 (1,200 gallon epoxy clear base mixer), P030 (700 gallon reactor), P031 (300 gallon reactor), P032 (2,500 gallon reactor), P033 (Generac Generator), P034 (150 Gallon Hockmeyer Mixer), P035 (300 Gallon Hockmeyer Mixer), P036 (500 Gallon Schold Mixer), P037 (250 Gallon Hockmeyer Mixer), P038 (150 Gallon Hockmeyer Mixer), P039 (250 Gallon Hockmeyer Mixer), P040 (Fixed Mixing Tank 104), P041 (2,000 Gallon Mixing Tank), P042 (1,000 Gallon Mixing Tank), T001 (6,134 gallon storage tank #1), T002 (5,086 gallon storage tank #2), T003 (5,086 gallon storage tank #3), T004 (6,000 gallon storage tank #4), T005 (6,000 gallon storage tank #5) and T006 (6,134 gallon storage tank #6), including any de minimus air contaminant sources, as defined in OAC rule 3745-15-05, and any permanent exemption air contaminant sources installed subsequent to the issuance of this permit shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

3. The permittee shall collect and record the following information each month for the emissions units identified in Section B.2.:

   a) The name and identification number of each HAP containing material employed;

   b) The individual Hazardous Air Pollutant (HAP)* content for each HAP of each HAP containing material, in pounds of individual HAP per gallon of HAP containing material, as applied;

   c) The total combined HAP content of each HAP containing material in pounds of combined HAPs per gallon of HAP containing material, as applied [sum all the individual HAP contents from (B.3.b)];

   d) The number of gallons of each HAP containing material employed;

   e) The name and identification of each HAP containing cleanup material employed;

   f) The individual HAP content for each HAP of each HAP containing cleanup material, in pounds of individual HAP per gallon of HAP containing cleanup material, as applied;

g) The total combined HAP content of each HAP containing cleanup material, in pounds of combined HAPs per gallon of HAP containing cleanup material, as applied [sum all the individual HAP contents from B.3.b)];

h) The number of gallons of each HAP containing cleanup material employed [the total number of gallons of each HAP containing cleanup material employed less the number of gallons of each HAP containing cleanup material collected for reuse and disposal];

i) The total individual HAP emissions for each HAP from all HAP containing material and HAP containing cleanup materials employed, in pounds or tons per month [for each HAP the sum of B.3.b) times B.3.d) times the emissions factor or overall control efficiency** (if applicable) for each HAP containing material plus the sum of B.3.f.) times B.3.h) for each HAP containing cleanup material plus individual HAP emissions from any de minims emissions units (as defined in OAC rule 3745-15-05), all emissions units exempt from the requirement to obtain a permit-to-install pursuant to OAC rule 3745-31-03 currently, and future to-be-installed air contaminant sources at the facility];

j) The total combined HAP emissions from all HAP containing materials and HAP containing cleanup materials employed, in pounds or tons per month [the sum of B.3.c) times B.3.d) times the emissions factor or overall control efficiency** (if applicable) for each coating plus the sum of B.3.g) times B.3.h) for each HAP containing cleanup material plus combined HAP emissions from any de minimis emissions units (as defined in OAC rule 3745-15-05), all emissions units exempt from the requirement to obtain a permit to install pursuant to OAC rule 3745-31-03 currently, and future to-be-installed air contaminant sources at the facility];

k) The updated rolling, 12-month summation of the individual HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and

l) The updated rolling, 12-month summation of the combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Southwest Ohio Air Quality Agency. This information does not have to be kept on an individual emissions unit basis.

**Overall control efficiency shall be from the most recent performance test that demonstrated that the emissions unit was in compliance.

4. The permittee shall notify the Southwest Ohio Air Quality Agency of any exceedance of the HAP emission limitations outlined in Section B.2. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June, and July through September, respectively).

5. Compliance with the HAP emission limitations cited in Section B.2. shall be demonstrated by the recordkeeping in Section B.3.

6. Thetotal volatile organic compounds (VOC) input from emissions units P006 (Shar Mixer), P008 (Hockmeyer Mixer 2), P017 (Hardener Tank), P021 (Tinting Area), P026 (Schold Mixer1), P027 (Schold Mixer 2), P028 (Myers Mixer), P029 (1,200 gallon epoxy clear base mixer), P030 (700 gallon reactor), P031 (300 gallon reactor), P032 (2,500 gallon reactor), P033 (Generac Generator), P034 (150 Gallon Hockmeyer Mixer), P035 (300 Gallon Hockmeyer Mixer), P036 (500 Gallon Schold Mixer), P037 (250 Gallon Hockmeyer Mixer), P038 (150 Gallon Hockmeyer Mixer), P039 (250 Gallon Hockmeyer Mixer), P040 (Fixed Mixing Tank 104), P041 (2,000 Gallon Mixing Tank), P042 (1,000 Gallon Mixing Tank), T001 (6,134 gallon storage tank #1), T002 (5,086 gallon storage tank #2), T003 (5,086 gallon storage tank #3), T004 (6,000 gallon storage tank #4), T005 (6,000 gallon storage tank #5) and T006 (6,134 gallon storage tank #6), including any de minimus air contaminant sources, as defined in OAC rule 3745-15-05, and any permanent exemption air contaminant sources installed subsequent to the issuance of this permit shall not exceed 100 TPY based on a rolling, 12-month summation.

   The VOC input of material employed shall be assumed to be 100 percent of the VOC content of the material employed, and, as such, is equivalent to the VOC emission rate.

   The identified emissions units above are existing emissions units and the company has existing records to verify this limitation and therefore does not need to be limited during the first year operation on a monthly basis. Any subsequent air contaminant sources installed subsequent to the issuance of this permit, the company will modify the above recordkeeping to include those installed sources such that the company's records will continued to show compliance with the above limitation.

7. The permittee shall collect and record the following information for each month for the emissions units identified in Section B.6. above:

   a) the company identification for each VOC containing liquid organic material employed;

   b) the amount of each VOC containing liquid organic material employed, in pounds per batch;

   c) the total number of batches;

   d) the amount of each VOC containing liquid organic material employed, in pounds per gallon in the above listed tanks;

   e) the total number of gallons in the above listed tanks;

   f) total VOC emissions rate in pounds [B.7.b) times B.7.c)] + [B.7.d) times B.7.e)]; and

   g) the updated rolling, 12-month summation of VOC emissions, in pounds or tons [summing of B.7.f)]. This shall include the information for the current month and the preceding 11 months.

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

   a) all deviations (excursions) of the VOC input limitation in Section B.6. have been detected by the monitoring, record keeping and/or testing requirements in this permit:

   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).

C. Emissions Unit Terms and Conditions

1. P026, High speed schold mixer

Operations, Property and/or Equipment Description:

Schold mixer with associated tubs

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

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

a. d)(1) thru d)(4) and e)(4).

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

a. b)(1)d.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) and ORC 3704.03(T).	1.50 tons of organic compounds (OC) per month averaged over a twelve-month rolling period.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01.	Particulate Emissions (PE), Particulate Matter 10 microns and less in diameter (PM10) and Particulate Matter 2.5 microns and less in diameter (PM2.5) shall not exceed 2.94 pounds per hour and 2.15 TPY. See b)(2)a.
c.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06.	See b)(2)b., b)(2)c. and b)(2)d.
d.	OAC rule 3745-31-05(D)	See Sections B.2. thru B.8.
e.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions shall not exceed 20% opacity, as a six-minute average, except as specified by rule.
f.	OAC rule 3745-17-07(B)(1)	Visible particulate emissions of fugitive dust from this emissions unit shall not

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		exceed twenty percent opacity as a three-minute average.
g.	OAC rule 3745-17-08(B)	The particulate emission rate at the control device outlet shall not exceed 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gas or no visible particulate emissions from the exhaust stack, whichever is less stringent. The permittee shall minimize or eliminate visible particulate emissions by the use of a cover and dust collector.
h.	OAC rule 3745-17-11(B)(1)	Particulate emissions (PE) from the fabric filter stack on the high speed mixer shall not exceed 2.94 lbs/hr as calculated based on Table 1 of OAC rule 3745-17-11.

(2) Additional Terms and Conditions

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

b. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE/PM10/PM2.5 from this air contaminant source because the calculated annual emission rate for PE/PM10/PM2.5 is less than ten tons per year, taking into account the federally enforceable rule limit of 2.94 lb of PE per hour under OAC rule 3745-17-11(B). The annual emission rate calculation assumed that all particulate emissions assumed within 1 hour of the batch time and as such the lb/hr amount is equivalent to pounds per batch.

2.94 lbs/batch x batch/6 hr x 8760 hr/year x ton/2000 lbs = 2.14 TPY

c. The permittee shall employ tightly fitted covers on this emissions unit.

d. Particulate emissions from the equipment comprising this emissions unit shall be captured and vented to a dust collector or an equivalent control device capable of complying with the PE/PM10/PM2.5 emission limitations specified in b)(1)b.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permit-to-install and operate (PTIO)application for these emissions units (P026 and P027) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or

ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "24" hours per day and "7" days per week, from that of 8 hours per day and 5 days per week. The resulting

calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

TLV/10 x 8/X x 5/Y = 4 TLV/XY = MAGLC

d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Toxic Contaminants: Styrene, Methyl Isobutyl Ketone, Toluene, Ethylbenzene and Xylene.

TLV (mg/m3): 85 (Styrene)

Maximum Hourly Emission Rate (lbs/hr): 1.83

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 480

MAGLC (ug/m3): 2027

(2) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

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

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final PTIO prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

(3) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):

a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);

c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

(4) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

(5) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack and for any visible emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the location and color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emissions incident; and

e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions

incident under item (d) above or continue the weekly check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

(6) The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned frequencies for performing the visible emissions checks if operating experience indicates that less frequent visible emissions checks would be sufficient to ensure compliance with the above-mentioned applicable requirements.

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 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.

(3) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(5) above:

a. all weeks during which any visible particulate emissions were observed from the stack serving this emissions unit;

b. all weeks during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and

c. any corrective actions taken to minimize or eliminate the visible particulate emissions from the stack and/or visible emissions of fugitive dust.

(4) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground−level concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.

f) Testing Requirements

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

a. Emission Limitation:

1.50 tons of organic compounds (OC) per month averaged over a twelve-month rolling period.

Applicable Compliance Method:

OC emissions shall be calculated and compliance determined by using the following equation:

Tons/month OC = [(A) x (B) x 1 Ton/2000 lbs] ÷ (1 year/12 months)

where,

A = OC emission factor of 24.7 lbs/batch, from PTIO application A0053289, submitted on May 8, 2015.

B = maximum number of batches per year (1460).

b. Emission Limitations:

Particulate Emissions (PE), Particulate Matter 10 microns and less in diameter (PM10) and Particulate Matter 2.5 microns and less in diameter (PM2.5) shall not exceed 2.94 pounds per hour and 2.15 TPY.

Applicable Compliance Methods:

PE/PM10/PM2.5 emissions shall be calculated and compliance determined by using the following equation:

The federally enforceable rule limit of 2.94 lb of PE per hour under OAC rule 3745-17-11(B) was calculated using the equation in f)(1)e. The annual emission rate calculation assumed that all particulate emissions assumed within 1 hour of the batch time and as such the lb/hr amount is equivalent to pounds per batch.

2.94 lbs/batch x batch/6 hr x 8760 hr/year x ton/2000 lbs = 2.14 TPY

c. Emission Limitations:

OC emission factor of 24.7 lbs/batch, from PTIO application A0053289, submitted on May 8, 2015.

Particulate emissions (PE) from the stack shall not exceed 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases or there shall be no visible particulate emissions from the exhaust stack, whichever is less stringent.

Particulate emissions (PE) from the fabric filter stack on the high speed mixer shall not exceed 2.94 lbs/hr.

Applicable Compliance Method:

If requiredby the Southwest Ohio Air Quality Agency, the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

i. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate(s) for organic compound (OC) and particulate emissions (PE), particulate matter ten microns and less in diameter (PM10), and/or particulate matter 2.5 microns and less in diameter (PM2.5) in the appropriate averaging period(s).

ii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

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

PE, Methods 1-4 and Method 5 of 40 CFR Part 60, Appendix A.

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

iii. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.

iv. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall

describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

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

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

d. Emission Limitation:

Visible particulate emissions from any/the stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule; and visible emissions from fugitive dust shall not exceed 20 percent opacity as a three-minute average.

Applicable Compliance Method:

If required, compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

e. Emission Limitation:

Particulate emissions (PE) from the fabric filter stack on the high speed mixer shall not exceed 2.94 lbs/hr as calculated based on Table 1 of OAC rule 3745-17-11.

Applicable Compliance Method:

The Table 1 emission limitation was calculated as follows:

$E = 4.10(\text{Production})^{0.67}$

Production = 500 gallon/batch x 14.67 lb./gallon x batch/6 hours x ton/2000 lb. = 0.61 ton/hr

$E = 4.10(0.61)^{0.67}$

E = 2.94 lb./hr of PE

g) Miscellaneous Requirements

(1) None.

2. P027, High speed schold mixer

Operations, Property and/or Equipment Description:

Schold mixer with associated tubs

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

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

a. d)(1) thru d)(4) and e)(4).

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

a. b)(1)d.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) and ORC 3704.03(T).	1.50 tons of organic compounds (OC) per month averaged over a twelve-month rolling period.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01.	0.18 ton of Particulate Emissions (PE), Particulate Matter 10 microns and less in diameter (PM10) and Particulate Matter 2.5 microns and less in diameter (PM2.5) per month averaged over a twelve-month rolling period. See b)(2)a.
c.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06.	See b)(2)b., b)(2)c. and b)(2)d.
d.	OAC rule 3745-31-05(D)	See Sections B.2. thru B.8.
e.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions shall not exceed 20% opacity, as a six-minute average, except as specified by rule.
f.	OAC rule 3745-17-07(B)(1)	Visible particulate emissions of fugitive dust from this emissions unit shall not

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		exceed twenty percent opacity as a three-minute average.
g.	OAC rule 3745-17-08(B)	The particulate emission rate at the control device outlet shall not exceed 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gas or no visible particulate emissions from the exhaust stack, whichever is less stringent. The permittee shall minimize or eliminate visible particulate emissions by the use of a cover and dust collector.
h.	OAC rule 3745-17-11(B)(1)	Particulate emissions (PE) from the fabric filter stack on the high speed mixer shall not exceed 2.94 lbs/hr as calculated based on Table 1 of OAC rule 3745-17-11.

(2) Additional Terms and Conditions

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

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

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE/PM10/PM2.5 from this air contaminant source because the calculated annual emission rate for PE/PM10/PM2.5 is less than ten tons per year, taking into account the federally enforceable rule limit of 2.94 lb of PE per hour under OAC rule 3745-17-11(B). The annual emission rate calculation assumed that all particulate emissions assumed within 1 hour of the batch time and as such the lb/hr amount is equivalent to pounds per batch.

2.94 lbs/batch x batch/6 hr x 8760 hr/year x ton/2000 lbs = 2.14 TPY

c. The permittee shall employ tightly fitted covers on this emissions unit.

d. Particulate emissions from the equipment comprising this emissions unit shall be captured and vented to a dust collector or an equivalent control device capable of complying with the PE/PM10/PM2.5 emission limitations specified in b)(1)a.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permit-to-install and operate (PTIO)application for these emissions units (P026 and P027) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or

ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "24" hours per day and "7" days per week, from that of 8 hours per day and 5 days per week. The resulting

calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

TLV/10 x 8/X x 5/Y = 4 TLV/XY = MAGLC

d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Toxic Contaminants: Styrene, Methyl Isobutyl Ketone, Toluene, Ethylbenzene and Xylene.

TLV (mg/m3): 85 (Styrene)

Maximum Hourly Emission Rate (lbs/hr): 1.83

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 480

MAGLC (ug/m3): 2027

(2) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

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

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final PTIO prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

(3) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):

a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);

c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

(4) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

(5) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack and for any visible emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the location and color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emissions incident; and

e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions

incident under item (d) above or continue the weekly check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

(6) The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned frequencies for performing the visible emissions checks if operating experience indicates that less frequent visible emissions checks would be sufficient to ensure compliance with the above-mentioned applicable requirements.

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 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.

(3) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(5) above:

a. all weeks during which any visible particulate emissions were observed from the stack serving this emissions unit;

b. all weeks during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and

c. any corrective actions taken to minimize or eliminate the visible particulate emissions from the stack and/or visible emissions of fugitive dust.

(4) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.

f) Testing Requirements

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

a. Emission Limitation:

1.50 tons of organic compound (OC) per month averaged over a twelve-month rolling period.

Applicable Compliance Method:

OC emissions shall be calculated and compliance determined by using the following equation:

Tons/month OC = [(A) x (B) x 1 Ton/2000 lbs] ÷ (1 year/12 months)

where,

A = OC emission factor of 24.7 lbs/batch, from PTIO application A0053289, submitted on May 8, 2015.

B = maximum number of batches per year (1460).

b. Emission Limitations:

0.18 ton of Particulate Emissions (PE), Particulate Matter 10 microns and less in diameter (PM10) and Particulate Matter 2.5 microns and less in diameter (PM2.5) per month averaged over a twelve-month rolling period.

Applicable Compliance Methods:

PE/PM10/PM2.5 emissions shall be calculated and compliance determined by using the following equation:

tons/month PE/PM10/PM2.5 = [(A) x (B) x 1 Ton/2000 lbs] ÷ (1 year/12 months)

where,

A = PE/PM10/PM2.5 OAC 3745-17-11 Table 1 emission factor of 2.94 lbs/hr assumed to be lb/batch, from PTIO application A0053289, submitted on May 8, 2015.

B = maximum number of batches per year (1460).

c. Emission Limitations:

OC emission factor of 24.7 lbs/batch, from PTIO application A0053289, submitted on May 8, 2015.

Particulate emissions (PE) from the stack shall not exceed 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases or there shall be no visible particulate emissions from the exhaust stack, whichever is less stringent.

Particulate emissions (PE) from the fabric filter stack on the high speed mixer shall not exceed 2.94 lbs/hr.

Applicable Compliance Method:

If requiredby the Southwest Ohio Air Quality Agency, the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

i. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate(s) for organic compound (OC) and particulate emissions (PE), particulate matter ten microns and less in diameter (PM10), and/or particulate matter 2.5 microns and less in diameter (PM2.5) in the appropriate averaging period(s).

ii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

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

PE, Methods 1-4 and Method 5 of 40 CFR Part 60, Appendix A.

iii. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPAThe test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test

under these conditions is justification for not accepting the test results as a demonstration of compliance.

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

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

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

d. Emission Limitation:

Visible particulate emissions from any/the stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule; and visible emissions from fugitive dust shall not exceed 20 percent opacity as a three-minute average.

Applicable Compliance Method:

If required, compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

e. Emission Limitation:

Particulate emissions (PE) from the fabric filter stack on the high speed mixer shall not exceed 2.94 lbs/hr as calculated based on Table 1 of OAC rule 3745-17-11.

Applicable Compliance Method:

The Table 1 emission limitation was calculated as follows:

$E = 4.10(\text{Production})^{0.67}$

Production = 500 gallon/batch x 14.67 lb./gallon x batch/6 hours x ton/2000 lb. = 0.61 ton/hr

$E = 4.10(0.61)^{0.67}$

E = 2.94 lb./hr of PE

g) Miscellaneous Requirements

(1) None.