Ohio Environmental Protection Agency

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

9/3/2015

Certified Mail

Yes	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

David Burr
International Paint LLC
640 NORTH ROCKY RIVER DR.
Berea, OH 44017

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1318067810
Permit Number: P0118609
Permit Type: Administrative Modification
County: Cuyahoga

Dear Permit Holder:

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

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

How to appeal this permit

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

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

How to save money, reduce pollution and reduce energy consumption

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

How to give us feedback on your permitting experience

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

How to get an electronic copy of your permit

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

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

Sincerely,

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

Cc: CDAQ

Response to Comments

Facility ID:	1318067810
Facility Name:	International Paint LLC
Facility Description:	Blending and packaging of industrial coatings.
Facility Address:	640 NORTH ROCKY RIVER DR. Berea, OH 44017 Cuyahoga County
Permit:	P0118609, Permit-To-Install and Operate - Administrative Modification
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the The Plain Dealer on 07/25/2015. The comment period ended on 08/24/2015.	
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: None

a. Comment: None

b. Response: None

We did not receive any comments on the Draft permit that was issued on 7/22/2015 and we have not made any further changes to the permit recommendation.

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
International Paint LLC

Facility ID:	1318067810
Permit Number:	P0118609
Permit Type:	Administrative Modification
Issued:	9/3/2015
Effective:	9/3/2015
Expiration:	9/19/2016

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
International Paint LLC

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Authorization

Facility ID:	1318067810
Application Number(s):	A0053014
Permit Number:	P0118609
Permit Description:	FEPTIO administrative modification for emissions units P003 - P009 (mixer stations) to remove all permit conditions associated with the use of the catalytic incinerator because the incinerator has been determined not to be necessary for volatile organic compound (VOC) emissions control; incorporate production limits in the permits in order to limit the VOC emissions at the facility; and revise fugitive and stack VOC emission limitations for the paint mixing stations.
Permit Type:	Administrative Modification
Permit Fee:	$700.00
Issue Date:	9/3/2015
Effective Date:	9/3/2015
Expiration Date:	9/19/2016

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

This document constitutes issuance to:

International Paint LLC
640 NORTH ROCKY RIVER DR.
Berea, OH 44017

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

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director

Authorization (continued)

Permit Number: P0118609
Permit Description: FEPTIO administrative modification for emissions units P003 - P009 (mixer stations) to remove all permit conditions associated with the use of the catalytic incinerator because the incinerator has been determined not to be necessary for volatile organic compound (VOC) emissions control; incorporate production limits in the permits in order to limit the VOC emissions at the facility; and revise fugitive and stack VOC emission limitations for the paint mixing stations.

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

Group Name: Paint Mixing Stations

Emissions Unit ID:	**P003**
Company Equipment ID:	Paint Mixing Station
Superseded Permit Number:	P0095163
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P004**
Company Equipment ID:	Paint Mixing Station
Superseded Permit Number:	P0095163
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P005**
Company Equipment ID:	Paint Mixing Station
Superseded Permit Number:	P0095163
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P006**
Company Equipment ID:	Paint Mixing Station
Superseded Permit Number:	P0095163
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P007**
Company Equipment ID:	Paint Mixing Station
Superseded Permit Number:	P0095163
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P008**
Company Equipment ID:	Paint Mixing Station
Superseded Permit Number:	P0095163
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P009**
Company Equipment ID:	Mixer #7
Superseded Permit Number:	P0105306
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) (c)(1)-(2), e)(1), f)(1), and g)(1)-(2)

   c) 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(D)(1) To avoid Title V and MACT subpart HHHHH	See c)(2) below.

      (2) Additional Terms and Conditions

         a. The emissions of Hazardous Air Pollutants (HAPs) from this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY from any combination of HAPs, based on a rolling, 12-month summation of the monthly HAP material usage rates.

         b. The facility-wide emission limit shall include emissions from the following units: K001, P003, P004, P005, P006, P007, P008, and P009.

   d) Operational Restrictions

      (1) None.

   e) Monitoring and/or Recordkeeping Requirements

      (1) The permittee shall collect and record the following information each month for all materials employed containing any hazardous air pollutants (HAPs) for the entire facility:

a. the name and identification number/code of each material containing any HAP;

b. the name of each individual HAP contained in each material employed (and identified in (a) above) and the pound(s) of each HAP per gallon of each HAP-containing material applied;

c. the number of gallons, or pounds, of each material employed during the month;

d. for each individual HAP, the total uncontrolled emissions from all the materials employed, in ton(s), i.e., for each individual HAP, the summation of the products of (b) times (c) for all the materials employed during the month, divided by 2,000 pounds;

e. the total uncontrolled combined HAPs emissions from all the materials employed during the month, in ton(s), i.e., the summation of all the individual HAPs emissions from (d) above;

f. for P003, P004, P005, P006, P007, P008 and P009 each individual HAP, the calculated, uncontrolled emission rate from all the materials employed, in ton(s), i.e., the total uncontrolled individual HAP emission rate calculated in C.1.f) for VOC emissions and multiplying by percent HAP for each individual HAP;

g. for P003, P004, P005, P006, P007, P008 and P009 the calculated, uncontrolled combined HAPs emission rate for all the materials employed, in ton(s), i.e., the uncontrolled total combined HAPs emission rate, calculated in C.1.f) for VOC emissions and multiplying by percent HAP for total combined HAPs;

h. for each individual HAP, the total emissions during the rolling, 12-month period, i.e., the summation of the individual HAP emissions, as recorded in (d) for K001 and (f) above, for the present month plus the previous 11 months of operation, in ton(s); and

i. the total combined HAP emissions during the rolling 12-month period, i.e., the summation of all HAP emissions, as recorded in (e) for K001 and (g) above, for the present month plus the previous 11 months of operation, in ton(s).

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act, or can be obtained by contacting the Cleveland Division of Air Quality (CDAQ). Material Safety Data Sheets (MSDS) typically include a listing of the solvents contained in the coatings and cleanup materials.

f) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports for emissions units K001, P003, P004, P005, P006, P007, P008 and P009 combined that identify:

a. all exceedances of the rolling, 12-month individual HAP emission limitation for each HAP for all materials employed;

b. all exceedances of the rolling, 12-month total combined HAPs emission limitation for all materials employed;

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

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

e. 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 CDAQ.

(2) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

g) Testing Requirements

(1) Compliance with the emission limitation(s) in Section c) of these terms and conditions shall be determined in accordance with the following method(s):

a. Emission Limitation:
Individual HAP emissions shall not exceed 9.9 tons per rolling, 12-month period for this facility.

Applicable Compliance Method:
Compliance shall be determined by the recordkeeping and reporting specified in Sections e) and f).

b. Emission Limitation:
Combined HAP emissions shall not exceed 24.9 tons per rolling, 12-month period for this facility.

Applicable Compliance Method:
Compliance shall be determined by the recordkeeping and reporting specified in Sections e) and f).

C. Emissions Unit Terms and Conditions

1. Emissions Unit Group -Paint Mixing Stations: P003,P004,P005,P006,P007,P008,P009,

EU ID	Operations, Property and/or Equipment Description
P003	Mixer station, portable process tanks up to 500 gallons, tank cleaning station, container filling station, ventilation system with dust collector
P004	Mixer station, portable process tanks up to 500 gallons, tank cleaning station, container filling station, ventilation system with dust collector
P005	Mixing station, portable process tanks up to 500 gallons, tank cleaning station, container filling station, ventilation system with dust collector
P006	Mixer station, portable process tanks up to 500 gallons, tank cleaning station, container filling station, ventilation system with dust collector
P007	Mixer station, portable process tanks up to 500 gallons, tank cleaning station, container filling station, ventilation system with dust collector
P008	Mixer station, portable process tanks up to 500 gallons, tank cleaning station, container filling station, ventilation system with dust collector
P009	Mixer station, portable process tanks up to 500 gallons, tank cleaning station, container filling station, ventilation system with dust collector

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. b)(1)b., b)(1)h., b)(2)c., d)(6)-(9) and e)(6)

(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)c., b)(2)a., c)(1), d)(2), e)(4), f)(1)e, and f)(1)f.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 6/30/2008	Particulate emissions (PE) shall not exceed 0.087 ton per month,for P003 - P009 combined, averaged over a rolling, 12-month period from the baghouse stack serving these emissions units. Fugitive particulate matter (PM) shall not exceed0.46 ton per month, for P003 - P009 combined, averaged over a rolling, 12-month period. Volatile organic compound (VOC) emissions shall not exceed 0.55 ton per month, for P003 - P009 combined, averaged over a rolling, 12-month period (stack plus fugitive). Visible particulate emissions from the stack serving this emissions unit shall not exceed 5% opacity, as a six-minute average. Visible emissions of fugitive dust shall not exceed 5% opacity, as a three-minute average. See b)(2)a. and b)(2)b. below.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 6/30/2008	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate and VOC emissions from this emissions unit since the calculated annual emission rate is less than 10 tons per year (TPY) taking into account the federally enforceable restriction in c)(1) below. See b)(2)c. below.
c.	OAC rule 3745-31-05(D) To avoid Title V	PE shall not exceed 1.04 ton per rolling, 12-months, for P003 - P009 combined, from the stack serving these emissions units. VOC emissions shall not exceed 6.58 tons per rolling, 12-months (stack plus fugitive), for P003 - P009 combined. See b)(2)a. and c)(1) below.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-17-07(A)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20% opacity as a six-minute average, except as provided by rule. See b)(2)e. below.
e.	OAC rule 3745-17-07(B)(1)	Visible emissions of fugitive dust from this emissions unit shall not exceed 20% opacity as a three-minute average. See b)(2)e. below.
f.	OAC rule 3745-17-08(B)(3)	Reasonably available control measures (RACM) must be employed to sufficiently minimize or eliminate visible emissions of fugitive dust. See b)(2)d. below.
g.	OAC rule 3745-17-11(B)(1)	PE shall not exceed 5.08 pounds per hour (lbs/hr). See b)(2)e. below.
h.	OAC rule 3745-114-01 ORC rule 3704.03(F)(4)(c)	See d)(6)-(9), and e)(6) below.

(2) Additional Terms and Conditions

a. The emissions from this emissions unit shall be vented to a baghouse whenever any one or more of emissions units P003, P004, P005, P006, P007, P008 and P009 are in operation, with a minimum capture efficiency of 95% and a minimum control efficiency of 99%, for PE.

b. These Best Available Technology (BAT) emission limits apply to PM and VOC emissions until the U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).

c. These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to this emissions unit since the controlled potential to emit for PE and uncontrolled VOCemissions are less than 10 tons per year taking into

account the federally enforceable limits in b)(1)c. and the federally enforceable requirement to use the baghouse at the efficiencies stated in b)(2)a.

d. The installation and use of hoods, fans, and/or other equipment to adequately enclose, contain, capture, vent, and control fugitive dust from this emissions unit shall meet the following requirements:

i. the collection efficiency shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.

e. Until such time the U.S. EPA approves the revision to OAC rule 3745-31-05, the more stringent or equivalent visible emissions and particulate limits established under OAC rule 3745-31-05(A)(3) shall apply. Upon U.S EPA approval of the revisions to OAC 3745-31-05, the rule based limits under OAC rule 3745-17-07(A), 3745-17-07(B) and 3745-17-11(B) shall go into effect.

f. The requirements of OAC rule 3745-21-07(M)(2) do not apply because these emissions units are not equipped with a VOC control device.

c) Operational Restrictions

(1) The maximum annual production rate for emissions units P003-P009 combined shall not exceed 3,000,000 gallons of product, based on a rolling, 12-month summation of the production rates.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for emissions units P003-P009 combined:

a. the name and identification of each product produced;

b. the pounds of pigment per gallon for each product produced;

c. the amount, in gallons per month, of each product produced;

d. the total amount, in gallons, of all products produced (i.e., summation of “c.” for all products) per month;

e. the rolling, 12-month summation of all products produced, in gallons, determined by summing the monthly amounts from d)(1)d.;

f. the amount of VOC emissions, in ton per month, using the equation(s) in f)(1); and

g. the amount of stack and fugitive particulate emissions, in ton/month, using the equations in f)(1).

(2) 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 0.1 to 6 inches of water.

(3) The permittee shall properly 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 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 Cleveland Division of Air Quality. 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.

(4) The permittee shall inspect the baghouse for leaks and visible emissions of fugitive dust at least once a month during operation periods. Records of such inspections shall include at a minimum the date the inspection was conducted, any and all results obtained, any problems discovered, and any corrective action taken.

(5) The FEPTIO application for these emissions units, P003-P009, was evaluated based on the actual materials and the design parameters of the emissions unit's(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., "**X**" hours per day and "**Y**" 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 Contaminant: Styrene

TLV (mg/m3): 85.20

Maximum Hourly Emission Rate (lbs/hr): 6.37 (all 7 mixers, using stack test results from 11/25/2014)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 5313

MAGLC (ug/m3): 8520, calculated using TLV/10 to represent actual operating hours of 8 hours per day, 5 days per week

The permittee has demonstrated that emissions of styrene, from emissions units P003-P009, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

(6) 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 FEPTIO 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.

(7) 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.

(8) 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.

e) Reporting Requirements

(1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director 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.

(2) 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.

(3) The permittee shall identify in the Annual PER any incidents during which the baghouse had any leaks or visible emissions of fugitive dust.

(4) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

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. 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;

ii. 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; and

iii. any exceedance of the rolling, 12-month production limitation.

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 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).

(5) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

(6) 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 b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:
PE shall not exceed 0.087 ton per month, for P003 - P009 combined, averaged over a rolling, 12-month period from the baghouse stack serving these emissions units.

Applicable Compliance Method:
This emission limitation was based on the following equation:

$E = \sum_i^n [(V_i) * (P_i) * \left(\frac{1\ ton}{2000\ lbs}\right) * (EF) * (CA) * (1 - CE) * \left(\frac{1\ ton}{2000\ lbs}\right)]$where,

E = emissions rate (ton/month)

V_i = volume of each product produced (gallons/month)

P_i = pigment concentration of each product produced (lbs/gal)

EF = emission factor (lbs/ton), 20 lbs PE/ton of pigment handled, taken from AP-42 Volume 1, 5th Edition, Chapter 6, Table 6.4-1

CA = amount captured by baghouse 95% = 0.95

CE = control efficiency of baghouse 99% = (1-.99)

Sum emissions from each product to determine total monthly emissions.

Sum the monthly emissions to determine the rolling, 12-month summation and divide by 12 months to determine the monthly average.

Compliance with the ton PE/month limitation shall be determined through the monitoring and recordkeeping requirements in d)(1) and using the equation above.

b. Emission Limitation:
Fugitive PM shall not exceed 0.46 ton per month, for P003 - P009 combined, averaged over a rolling, 12-month period

Applicable Compliance Method:
This emission limitation was based on the following equation:

$$E = \sum_{i}^{n} [(V_i) * (P_i) * \left(\frac{1\ ton}{2000\ lbs}\right) * (EF) * (1 - CA) * \left(\frac{1\ ton}{2000\ lbs}\right)]$$

where,

E = emissions rate (ton/month)

V_i = volume of each product produced (gallons/month)

P_i = pigment concentration of each product produced (lbs/gal)

EF = emission factor (lbs/ton), 20 lbs PE/ton of pigment handled, taken from AP-42 Volume 1, 5th Edition, Chapter 6, Table 6.4-1

CA = capture efficiency 95% = 0.95

Sum emissions from each product to determine total monthly emissions.

Sum the monthly emissions to determine the rolling, 12-month summation and divide by 12 months to determine the monthly average.

Compliance with the ton fugitive PM/month limitation shall be determined through the monitoring and recordkeeping requirements in section d)(1) and using the equation above.

c. Emission Limitation:
VOC emissions shall not exceed 0.55 ton per month, for P003 - P009 combined, averaged over a rolling, 12-month period (stack plus fugitive) for each emissions unit

Applicable Compliance Method:
This emission limitation was based on the following equation:

E = [(EFvoc stack) + (EFvoc charging) + (EFvoc filling)] * (Qp) * (1 ton/2,000 lbs)

where,

E = emissions rate (ton/month)

EFvocstack = emission factor for stack emissions (lbs/1,000 gal), 3.64lbs VOC/1,000 gal product, based on the average VOC emission rate of 0.91 lb/hr, obtained during the November 2014 emissions testing, with a scale-up factor of 2, a batch mixing time of 1 hour, and a maximum batch size of 500 gal/unit.

(0.91 lb/hr *2) * (1 hr/batch) * (1 batch/500 gal) * 1,000

= 3.64 lb VOC/1,000 gal product

EFvoc charging = emission factor for material charging fugitive emissions (lbs/1,000 gal), 0.37 lb VOC/1,000 gal product, determined in accordance with methodology in AP-42 Section 5.2.2. Based on the following equation:

VOC Emission Factor (lb/1,000 gal) = 12.46 * [(S * P * M) / T]

where,
S = saturation factor, 1.45
P = vapor pressure (psia), 0.1012
M = molar mass (lb/lb-mole), 104.2
T = product temperature (°R), 509.97

EFvoc filling = emission factor of product filling fugitive emissions (lbs/1,000 gal), 0.37 lb VOC/1,000 gal product, determined in accordance with methodology in AP-42 Section 5.2.2. Based on the following equation:

VOC Emission Factor (lb/1,000 gal) = 12.46 * [(S * P * M) / T]

where,
S = saturation factor, 1.45
P = vapor pressure (psia), 0.1012
M = molar mass (lb/lb-mole), 104.2
T = product temperature (°R), 509.97

Qp = monthly amount of product produced, in 1,000 gal/month

Sum monthly emissions to determine the rolling, 12-month summation and divide by 12 months to determine the monthly average.

Compliance with the tons VOC/month limitation shall be determined through the monitoring and recordkeeping requirements in d)(1) and using the equation above.

d. Emission Limitation:
Visible particulate emissions from the baghouse stack shall not exceed 5% opacity as a six-minute average, except as specified by rule; and visible emissions of fugitive dust shall not exceed 5% opacity as a three-minute average.

Applicable Compliance Method:
If required, compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9.

e. Emission Limitation:
PE shall not exceed 1.04 ton per rolling 12 months, for P003 – P009 combined, from the baghouse stack serving these emissions units.

Applicable Compliance Method:
This emission limitation was based on the following equation:

$$E = \sum_{i}^{n} [(V_i) * (P_i) * \left(\frac{1\ ton}{2000\ lbs}\right) * (EF) * (CA) * (1 - CE) * \left(\frac{1\ ton}{2000\ lbs}\right)]$$

where,

E = emissions rate (ton/month)

V_i = volume of each product produced (gallons/month)

P_i = pigment concentration of each product produced (lbs/gal)

EF = emission factor (lbs/ton), 20 lbs PE/ton of pigment handled, taken from AP-42 Volume 1, 5th Edition, Chapter 6, Table 6.4-1

CA = amount captured by baghouse 95% = 0.95

CE = control efficiency of baghouse 99% = (1-.99)

Sum emissions from each product to determine total monthly emissions.

Sum the monthly emissions to determine the rolling, 12-month summation.

Compliance with the annual PE emission limitation shall be determined through the monitoring and recordkeeping requirements in d)(1) and using the equation above.

f. Emission Limitation:
VOC emissions shall not exceed 6.58 tons per rolling 12 months (stack plus fugitive), for P003 - P009 combined.

Applicable Compliance Method:
This emission limitation was based on the following equation:

E = [(EFvoc stack) + (EFvoc charging) + (EFvoc filling)] * (Qp) * (1 ton/2,000 lbs)

where,

E = emissions rate (ton/month)

EFvocstack = emission factor of the stack (lbs/1,000 gal), 3.64lbs VOC/1,000 gal product, based on the average VOC emission rate of 0.91 lb/hr, obtained during the November 2014 emissions testing, with a scale-up factor of 2, a batch mixing time of 1 hour, and a maximum batch size of 500 gal/unit.

(0.91 lb/hr *2) * (1 hr/batch) * (1 batch/500 gal) * 1,000

= 3.64 lb VOC/1,000 gal product

EFvoc charging = emission factor of material charging fugitive emissions (lbs/1,000 gal), 0.37 lb VOC/1,000 gal product, determined in accordance with methodology in AP-42 Section 5.2.2. Based on the following equation:

VOC Emission Factor (lb/1,000 gal) = 12.46 * [(S * P * M) / T]

where,
S = saturation factor, 1.45
P = vapor pressure (psia), 0.1012
M = molar mass (lb/lb-mole), 104.2
T = product temperature (°R), 509.97

EFvoc filling = emission factor of product filling fugitive emissions (lbs/1,000 gal), 0.37 lb VOC/1,000 gal product, determined in accordance with methodology in AP-42 Section 5.2.2. Based on the following equation:

VOC Emission Factor (lb/1,000 gal) = 12.46 * [(S * P * M) / T]

where,
S = saturation factor, 1.45
P = vapor pressure (psia), 0.1012
M = molar mass (lb/lb-mole), 104.2
T = product temperature (°R), 509.97

Qp = monthly amount of product produced, in 1,000 gal/month

Sum monthly emissions to determine the rolling, 12-month summation.

Compliance with the tons VOC/month limitation shall be determined through the monitoring and recordkeeping requirements in d)(1) and using the equation above.

g. <u>Emission Limitation</u>:
Visible particulate emissions from the baghouse stack shall not exceed 20% opacity as a six-minute average, except as specified by rule; and visible emissions of fugitive dust shall not exceed 20% opacity as a three-minute average.

Applicable Compliance Method:
If required, compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9.

h. Emission Limitation:
PE shall not exceed 5.08 lbs/hr

Applicable Compliance Method:
If required by the Ohio EPA or CDAQ, compliance with allowable particulate emissions limit shall be determined in accordance with U.S. EPA Reference Methods 1 through 5 of 40 CFR Part 60, Appendix A.

(2) The permittee conducted emission testing for this emissions unit on 11/25/2014.

g) Miscellaneous Requirements

(1) The PE, VOC, and HAP emissions from mixing stations P003-P009 are currently vented to a catalytic incinerator and baghouse (per P0095163 and P0105306). Emission testing before the outlet stream vents to the incinerator was done on 11/25/2014 to determine uncontrolled actual VOC emissions. An emission rate of 0.91 lb/hr as styrene per each mixing station was determined. With this permit modification, International Paint (IP) is proposing to limit annual production to 3,000,000 gallons of product for P003 – P009 combined. The uncontrolled VOC emissions associated with this production limitation will remain below 10 tons per year for P003 – P009 combined. Therefore, IP proposes to remove the catalytic incinerator, as it is no longer needed to control VOC emissions from the mixing stations. The PE and HAP emission limitations will remain unchanged.