Ohio Environmental Protection Agency

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

Certified Mail

1/20/2016

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	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

Mr. Ronald Lee
Plasti-Kote Co., Inc.
1000 Lake Rd
Medina, OH 44256

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1652050060
Permit Number: P0118580
Permit Type: Renewal
County: Medina

Dear Permit Holder:

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

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

How to appeal this permit

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

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

How to save money, reduce pollution and reduce energy consumption

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

How to give us feedback on your permitting experience

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

How to get an electronic copy of your permit

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

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

Sincerely,

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

Cc: ARAQMD

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
Plasti-Kote Co., Inc.

Facility ID:	1652050060
Permit Number:	P0118580
Permit Type:	Renewal
Issued:	1/20/2016
Effective:	1/20/2016
Expiration:	1/20/2021

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
Plasti-Kote Co., Inc.

Table of Contents

Authorization 1

A. Standard Terms and Conditions 6

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

B. Facility-Wide Terms and Conditions 11

C. Emissions Unit Terms and Conditions 17

1. P007, Specialty Products Mixing Room 18
2. P021, Degassing Booth 26
3. P025, Tank Washing (Combined P025 and P026) 28
4. P060, Ball Mill 34
5. Emissions Unit Group - Filling Lines Group 1: P002, P003, P004, P005 40
6. Emissions Unit Group - Filling Lines Group 2: P047, P048, P049 42
7. Emissions Unit Group - Large Mixing Tanks: P018, P019, P020, P050, P051, P052, P053, P054, P055, P056, P057 48
8. Emissions Unit Group - Paint Mixing Stations Group 1: P011, P012 60

9. Emissions Unit Group - Paint Mixing Stations Group 2: P009, P010, P013, P014, P015, P016, P017 . 66
10. Emissions Unit Group - Paint Mixing Stations Group 3: P022, P023, P024 77
11. Emissions Unit Group - Pre-Mix Stations: P029, P030 84
12. Emissions Unit Group - Sand Mills: P061, P062, P063 91

Authorization

Facility ID:	1652050060
Application Number(s):	A0052745
Permit Number:	P0118580
Permit Description:	FEPTIO Renewal for a paint and coating manufacturing facility.
Permit Type:	Renewal
Permit Fee:	$0.00
Issue Date:	1/20/2016
Effective Date:	1/20/2016
Expiration Date:	1/20/2021

Permit Evaluation Report (PER) Annual Date: Apr 1 - Mar 31, Due May 15

This document constitutes issuance to:

Plasti-Kote Co., Inc.
1000 LAKE RD
Medina, OH 44256-3598

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

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director

Authorization (continued)

Permit Number: P0118580
Permit Description: FEPTIO Renewal for a paint and coating manufacturing facility.

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

Emissions Unit ID:	**P007**
Company Equipment ID:	Specialty Products Mixing Room
Superseded Permit Number:	P0114991
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P021**
Company Equipment ID:	Degassing Booth
Superseded Permit Number:	P0114990
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P025**
Company Equipment ID:	Tank Washing (Combined P025 and P026)
Superseded Permit Number:	P0114991
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P060**
Company Equipment ID:	Ball Mill
Superseded Permit Number:	P0114990
General Permit Category and Type:	Not Applicable

Group Name: Filling Lines Group 1

Emissions Unit ID:	**P002**
Company Equipment ID:	Filling Line #1
Superseded Permit Number:	P0114990
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P003**
Company Equipment ID:	Filling Line #2
Superseded Permit Number:	P0114990
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P004**
Company Equipment ID:	Filling Line #3
Superseded Permit Number:	P0114990
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P005**
Company Equipment ID:	Filling Line #4
Superseded Permit Number:	P0114990
General Permit Category andType:	Not Applicable

Group Name: Filling Lines Group 2

Emissions Unit ID:	**P047**
Company Equipment ID:	Filling Line #5
Superseded Permit Number:	P0114991
General Permit Category andType:	Not Applicable

Emissions Unit ID:	**P048**
Company Equipment ID:	Filling Line #6
Superseded Permit Number:	P0114991
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P049**
Company Equipment ID:	Filling Line #7
Superseded Permit Number:	P0114991
General Permit Category andType:	Not Applicable

Group Name: Large Mixing Tanks

Emissions Unit ID:	**P018**
Company Equipment ID:	L2 Large Mixing Tank
Superseded Permit Number:	P0114991
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P019**
Company Equipment ID:	L4 Large Mixing Tank
Superseded Permit Number:	P0114991
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P020**
Company Equipment ID:	L3 Large Mixing Tank
Superseded Permit Number:	P0114991
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P050**
Company Equipment ID:	L1 Large Mixing Tank
Superseded Permit Number:	P0114991
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P051**
Company Equipment ID:	L5 Large Mixing Tank
Superseded Permit Number:	P0114991
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P052**
Company Equipment ID:	L6 Large Mixing Tank
Superseded Permit Number:	P0114991
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P053**
Company Equipment ID:	L7 Large Mixing Tank
Superseded Permit Number:	P0114991
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P054**
Company Equipment ID:	L8 Large Mixing Tank
Superseded Permit Number:	P0114991
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P055**
Company Equipment ID:	L9 Large Mixing Tank
Superseded Permit Number:	P0114991
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P056**
Company Equipment ID:	L10 Large Mixing Tank
Superseded Permit Number:	P0114991
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P057**
Company Equipment ID:	L11 Large Mixing Tank
Superseded Permit Number:	P0114991
General Permit Category andType:	Not Applicable

Group Name: Paint Mixing Stations Group 1

Emissions Unit ID:	**P011**
Company Equipment ID:	Paint Mixing Station #3
Superseded Permit Number:	P0114991
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P012**
Company Equipment ID:	Paint Mixing Station #7
Superseded Permit Number:	P0114991
General Permit Category andType:	Not Applicable

Group Name: Paint Mixing Stations Group 2

Emissions Unit ID:	**P009**
Company Equipment ID:	Paint Mixing Station #1
Superseded Permit Number:	P0114991
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P010**
Company Equipment ID:	Paint Mixing Station #2
Superseded Permit Number:	P0114991
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P013**
Company Equipment ID:	Paint Mixing Station #4
Superseded Permit Number:	P0114991
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P014**
Company Equipment ID:	Paint Mixing Station #9
Superseded Permit Number:	P0114991
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P015**
Company Equipment ID:	Paint Mixing Station #12
Superseded Permit Number:	P0114991
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P016**
Company Equipment ID:	Paint Mixing Station #13
Superseded Permit Number:	P0114991
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P017**
Company Equipment ID:	Paint Mixing Station #14
Superseded Permit Number:	P0114991
General Permit Category andType:	Not Applicable

Group Name: Paint Mixing Stations Group 3

Emissions Unit ID:	**P022**
Company Equipment ID:	Paint Mixing Station #5
Superseded Permit Number:	P0114990
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P023**
Company Equipment ID:	Paint Mixing Station #6
Superseded Permit Number:	P0114990
General Permit Category andType:	Not Applicable

Emissions Unit ID:	**P024**
Company Equipment ID:	Paint Mixing Station #8
Superseded Permit Number:	P0114990
General Permit Category andType:	Not Applicable

Group Name: Pre-Mix Stations

Emissions Unit ID:	**P029**
Company Equipment ID:	Mill Pre-Mixing Station #1
Superseded Permit Number:	P0114991
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P030**
Company Equipment ID:	Mill Pre-Mixing Station #2
Superseded Permit Number:	P0114991
General Permit Category andType:	Not Applicable

Group Name: Sand Mills

Emissions Unit ID:	**P061**
Company Equipment ID:	Sand Mill #1
Superseded Permit Number:	P0114990
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P062**
Company Equipment ID:	Sand Mill #2
Superseded Permit Number:	P0114990
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P063**
Company Equipment ID:	Sand Mill #3
Superseded Permit Number:	P0114990
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) B.2. through B.6.

2. Facility-wide emissions shall not exceed the following:

   a) 9.5 tons of any individual hazardous air pollutant (HAP) per rolling, 12-month period;

   b) 24.5 tons of total combined HAPs per rolling, 12-month period; and

   c) 99.5 tons of volatile organic compounds (VOC) per rolling, 12-month period.

   The permittee has requested these emission limitations to avoid being classified as a major source for Title V and to avoid being classified as a major source as defined in section 63.2 of 40 CFR Part 63 for any upcoming and promulgated Maximum Achievable Control Technology (MACT) standards (i.e., Miscellaneous Organic Chemical Production and Processes, 40 CFR Part 63, Subpart FFFF, Plastic Parts (surface coating), 40 CFR Part 63, Subpart PPPP, and Miscellaneous Coating Manufacturing, 40 CFR Part 63, Subpart HHHHH).

3. The permittee shall maintain records of the following information:

   a) The permittee shall maintain the following monthly records for emissions unit R007:

      (1) the name and identification number of each coating, as applied;

      (2) the VOC content of each coating employed or the “worst-case” VOC content of all the coatings employed for each coating type, in pound(s) of VOC per gallon of coating, as applied;

      (3) the individual HAP* content for each HAP of each coating employed or the “worst-case” individual HAP content for each HAP from all coating employed for each coating type, in pound(s) of each HAP per gallon of coating, as applied;

      (4) the total combined HAPs content of each coating employed or the “worst-case” total combined HAPs content of all coatings employed for each coating type, in pound(s) of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from a)(3) above);

(5) the number of gallons of each coating employed or if using the "worst-case" coating the total number of gallons of all coatings employed for each coating type;

(6) the name and identification of each cleanup material employed;

(7) the VOC content of each cleanup material, in pound(s) of VOC per gallon of cleanup material, as applied;

(8) the individual HAP content for each HAP of each cleanup material, in pound(s) of each HAP per gallon of cleanup material, as applied;

(9) the total combined HAPs content of each cleanup material, in pound(s) of total combined HAPs per gallon of cleanup material, as applied (sum all the individual HAP contents from a)(8) above);

(10) the number of gallons of each cleanup material employed;

(11) the VOC emissions from emissions unit R007, in ton(s) per month;

(12) the individual HAP emissions for each HAP from emissions unit R007, in ton(s) per month; and

(13) the total combined HAPs emissions from emissions unit R007, in ton(s) per month.

*A listing of the HAPs can be found in section 112(b) of the Clean Air Act or can be obtained by contacting the appropriate Ohio EPA District Office or Local Air Agency. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on a line-by-line basis.

Note: At a minimum, the permittee shall verify annually that the "worst-case" coating contents for each coating type employed in the spreadsheet calculations are at or above the actual coating contents that were employed in emissions unit R007. The permittee shall maintain documentation of the annual verification.

b) The permittee shall maintain the following monthly records for emissions units P002, P003, P004 and P005:

(1) the total number of aerosol paint cans filled using emissions units P002, P003 and P004;

(2) the total number of aerosol paint cans filled using emissions unit P005; and

(3) the VOC emission rate from gassing, in ton(s) per month (i.e., b)(1) times 0.0033 pounds of VOC per can* plus b)(2) times 0.002168 pounds of VOC per can**, then divide by 2,000 pounds per ton).

*Emission factor is based on results of the stack testing conducted on April 18, 2013.

**Emission factor is based on manufacturing and/or stack testing data supplied by the permittee in the correspondence dated April 25, 2001.

Note: The VOC, individual HAP and total combined HAPs emissions from the mixing prior to filling the cans with paint and the filling of paint into the cans for emissions unit P002, P003, P004 and P005 are determined in c) below.

c) The permittee shall maintain the following monthly records for emissions units P007, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P022, P023, P024, P029, P030, P047, P048, P049, P050, P051, P052, P053, P054, P055, P056, P057, P060, P061, P062, P063, the mixing prior to filling the aerosol paint cans for emissions units P002, P003, P004 and P005 and the filling of paint into the cans for emissions units P002, P003, P004 and P005, combined:

(1) the total throughput of each paint category, in gallons per month;

(2) the VOC emission rate, in ton(s) per month (i.e., using worst-case derived combined emission factor for each paint category as calculated using EIIP Preferred and Alternative Methods for Estimating Air Emissions Volume II, Chapter 8, Section 4, equations 8.4-1, 8.4-10, and 8.4-22);

(3) the individual HAP emission rate for each HAP, in ton(s) per month (i.e., using worst-case derived combined emission factor for each paint category as calculated using EIIP Preferred and Alternative Methods for Estimating Air Emissions Volume II, Chapter 8, Section 4, equations 8.4-1, 8.4-10, and 8.4-22)); and

(4) the total combined HAPs emission rate, in ton(s) per month (i.e., the sum of the individual HAP emission rates from c)(3) above).

d) The permittee shall maintain the following monthly records for emissions unit P021:

(1) the number of cans degassed per month; and

(2) the VOC emission rate, in ton(s) per month (i.e., d)(1) times 0.192 pound of VOC per can degassed*, then divide by 2,000 pounds per ton).

*Emission factor supplied by the permittee in correspondence dated September 15, 2000.

e) The permittee shall maintain the following monthly records for emissions unit P025:

(1) the number of tanks cleaned;

(2) the VOC from all cleanup materials employed, in ton(s) per month (i.e., the permittee may use the spreadsheet titled Tank Washing to determined the emissions);

(3) the individual HAP emissions for each HAP from all cleanup materials employed, in ton(s) per month (i.e., the permittee may use the spreadsheet titled Tank Washing to determined the emissions); and

(4) the total combined HAPs emissions from all cleanup materials employed, in ton(s) per month (i.e., the permittee may use the spreadsheet titled Tank Washing to determined the emissions).

f) The permittee shall maintain the following monthly records for the entire facility:

(1) the VOC emission rate for the entire facility, in ton(s) per month (i.e., a)(11) plus b)(3) plus c)(2) plus d)(2) plus e)(2) plus (X*/12);

(2) the individual HAP emission rate for each HAP for the entire facility, in ton(s) per month (i.e., a)(12) plus c)(3) plus e)(3) plus (Y**/12));

(3) the total combined HAPs emission rate for the entire facility, in ton(s) per month (i.e., a)(13) plus c)(4) plus e)(4) plus (Z***/12) or the summation of the individual HAP emissions rates from f)(2)); and

(4) the rolling, 12-month summation of the monthly emissions of each individual HAP, total combined HAPs and VOC for the entire facility for each calendar month.

*The annual potential to emit for VOC for the emissions units exempt under OAC rule 3745-31-03 and OAC rule 3745-15-05 “De Miminis” air contaminant source exemption.

**The annual potential to emit for each individual HAP for the emissions units exempt under OAC rule 3745-31-03 and OAC rule 3745-15-05 “De Miminis” air contaminant source exemption.

***The annual potential to emit for combined HAPs for the emissions units exempt under OAC rule 3745-31-03 and OAC rule 3745-15-05 “De Miminis” air contaminant source exemption.

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:

(1) 9.5 tons of any individual HAP per rolling, 12-month period for the entire facility;

(2) 24.5 tons of total combined HAPs per rolling, 12-month period for the entire facility; and

(3) 99.5 tons of VOC per rolling, 12-month period for the entire facility.

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

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

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

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

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

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

5. Compliance with the Emission Limitations and/or Control Requirements specified in section B.2. of these terms and conditions shall be determined in accordance with the following methods:

   a) Emission Limitations:

      9.5 tons of any individual HAP per rolling, 12-month period for the entire facility

      24.5 tons of total combined HAPs per rolling, 12-month period for the entire facility

      99.5 tons of VOC per rolling, 12-month period for the entire facility

      Applicable Compliance Method:

      Compliance with the annual allowable VOC, individual HAP, and total combined HAPs emission limitations identified above shall be demonstrated based on the record keeping requirements established in section B.3. of this permit.

6. The Ohio EPA has determined that this facility may be subject to the requirements of 40 CFR Part 63 Subpart CCCCCCC, the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Area Sources: Paints and Allied Products Manufacturing. At this time the Ohio EPA is not accepting the delegating authority to enforce NESHAP standards for area sources. The requirements of this rule, that are applicable to the area source(s) (for hazardous air pollutants) identified in this permit, shall be enforceable by U.S. EPA. Region 5. The complete requirements of this rule (including the Part 63 General Provisions) may be accessed via the Internet from the Electronic code of Federal Regulations (e-CFR) website http://www.ecfr.gov/ or by contacting the appropriate Ohio EPA District Office or Local Air Agency.

C. Emissions Unit Terms and Conditions

1. P007, Specialty Products Mixing Room

Operations, Property and/or Equipment Description:

Fleckstone (multi-colored texture paint) mixing and blending area

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)g. and g)(1).

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

a. b)(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)	Particulate emissions (PE) shall not exceed 0.52 pound per hour and 2.28 tons per year. Organic compound (OC) emissions shall not exceed 3.53 pounds per hour. See b)(2)a. and b)(2)b. below.
b.	OAC rule 3745-17-07(A)(1)	Visible PE from the stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
c.	OAC rule 3745-17-07(B)(1)	Visible PE of fugitive dust shall not exceed 20% opacity as a 3-minute average.
d.	OAC rule 3745-17-08(B)(3)	See b)(2)c. below.
e.	OAC rule 3745-17-11(B)(1)	See b)(2)d. below.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
f.	OAC rule 3745-31-05(D) [Synthetic Minor to avoid Title V and 40 CFR Part 63, Subparts FFFF, PPPP, and HHHHH]	See sections B.2. through B.5. of the Facility-Wide Terms and Conditions.
g.	OAC rule 3745-114-01	See g)(1) below.

(2) Additional Terms and Conditions

a. The PE from this emissions unit shall be vented to the baghouse at all times the emissions unit is in operation and using powder raw materials (particulate emission producing).

b. The hourly OC emission limitation and hourly and annual PE limitations regulated per OAC rule 3745-31-05(A)(3) is based on the emissions unit's potential to emit. Therefore, no record keeping or reporting is required to demonstrate compliance with these emission limitations.

However, if any proposed change(s), such as with production capacity, the types and/or quantities of materials used or processed, or anything else that increases the potential emissions of any air pollutant, then the permittee shall apply for and obtain either a modification to the federally enforceable permit-to-install and operate (FEPTIO) or a new final FEPTIO prior to the change(s).

c. 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 emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design; and

ii. the control equipment for this emissions unit shall achieve an outlet emission rate of not greater than 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases or there shall be no visible particulate emissions (whichever is less stringent) from the exhaust stack of this emissions unit.

d. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the baghouse is between 0.1 to 5.0 inches of water.

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

(3) 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.

(4) This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or Local Air Agency. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit. 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.

(5) The permittee shall perform quarterly checks, when the emissions unit is in operation and when weather conditions allow, for any visible particulate emissions from the baghouse stack and any visible emissions of fugitive dust from the non-stack 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 quarterly in an operations log. If visible emissions are observed, the permittee shall also note the following in an 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 event; and

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

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item d)(5)d. above or continue the quarterly check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions units). 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 units continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

(6) For additional monitoring and/or record keeping requirements, see section B.3. of the Facility-Wide Terms and Conditions.

e) Reporting Requirements

(1) 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.

(2) The permittee shall identify in the annual PER the following information concerning the operations of the baghouse during the 12-month reporting period for this emissions unit:

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 was in operation and using powder raw materials (particulate emission producing) and the process emissions were not vented to the baghouse;

c. each incident of deviation described in e)(2)a. above where a prompt investigation was not conducted;

d. each incident of deviation described in e)(2)a. above 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 e)(2)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 the following information in the annual PER in accordance with the monitoring requirements located in section d)(5) above:

a. each quarterly check during which any visible particulate emissions were observed from any stack;

b. each quarterly check during which any visible fugitive particulate emissions were observed from any non-stack egress point (i.e., building windows, doors, roof monitors, etc.); and

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

(4) 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.

(5) For additional reporting requirements, see section B.4. of the Facility-Wide Terms and Conditions.

f) Testing Requirements

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

a. Emission Limitations:

PE shall not exceed 0.52 pound per hour and 2.28 tons per year.

Applicable Compliance Methods:

Compliance with the hourly allowable PE limitation identified above shall be demonstrated by multiplying the emission factor of 20 pounds of PE per ton of dry pigment (AP-42 Table 6.4-1, dated 5/83) by the maximum hourly amount of dry pigment (ton(s) per hour) and the overall control efficiency of the baghouse (1-0.9).

If required, compliance with the hourly allowable PE limitation above shall be determined based on the results of emissions testing conducted in accordance with U.S. EPA Methods 1 through 5 of 40 CFR Part 60, Appendix A.

The annual allowable PE limitation above was determined by multiplying the hourly allowable PE limitation by 8,760 hours per year, and then dividing by 2,000 pounds per ton. Therefore, as long as compliance with the hourly allowable emission limitation is maintained, compliance with the annual allowable emission limitation shall be assumed.

b. Emission Limitation:

OC emissions shall not exceed 3.53 pounds per hour.

Applicable Compliance Method:

Compliance with the hourly allowable OC emission limitation identified above shall be demonstrated by multiplying the emission factor of 0.0157 pound of OC per gallon of paint produced* by the maximum hourly production rate (gallons per hour).

*Emission factor is the worst-case derived emission factor as calculated using EIIP Preferred and Alternative Methods for Estimating Air Emissions Volume II, Chapter 8, Section 4, equation 8.4-1 and equation 8.4-22.

c. Emission Limitation:

Visible PE from the stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance with the stack opacity limitation identified above shall be determined through visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A.

d. Emission Limitation:

Visible PE of fugitive dust shall not exceed 20% opacity as a 3-minute average.

Applicable Compliance Method:

If required, compliance with the fugitive opacity limitation identified above shall be determined through visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A and the procedures specified in OAC rule 3745-17-03(B)(3).

e. Emission Limitation:

The controlled emissions from the stack shall achieve an outlet emission rate of not greater than 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases, or there shall be no visible emissions from the exhaust stack.

Applicable Compliance Methods:

Compliance with the requirement for no visible particulate emissions from the exhaust stack, identified in this permit, shall be determined in accordance with Method 22 of 40 CFR Part 60, Appendix A. If opting to comply with the outlet particulate emissions rate, compliance with the 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases from the stack shall be determined by emissions testing performed in accordance with Methods 1 through 5 of 40 CFR Part 60, Appendix A.

g) Miscellaneous Requirements

(1) Modeling to demonstrate compliance with, the “Toxic Air Contaminant Statute”, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit’s maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified FEPTIO prior to making a “modification” as defined by OAC

rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new FEPTIO.

2. P021, Degassing Booth

Operations, Property and/or Equipment Description:

Removal of propellant gas (propane) from scrap product paint spray cans - Degassing Booth

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

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

a. None.

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

a. b)(1)a.

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(D) [Synthetic Minor to avoid Title V and 40 CFR Part 63, Subparts FFFF, PPPP, and HHHHH]	See sections B.2. through B.5. of the Facility-Wide Terms and Conditions.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) For additional monitoring and/or record keeping requirements, see section B.3. of the Facility-Wide Terms and Conditions.

e) Reporting Requirements

(1) 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.

(2) 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.

(3) For additional reporting requirements, see section B.4. of the Facility-Wide Terms and Conditions.

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. None.

g) Miscellaneous Requirements

(1) None.

3. P025, Tank Washing (Combined P025 and P026)

Operations, Property and/or Equipment Description:

Tank washing of portable tanks and totes using an automatic washer and a scrub brush to manually clean the top rim of the portable tanks and totes - Tank Washing

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)c., d)(1) through d)(4), and e)(2).

(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)b.

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)	Organic compound (OC) emissions shall not exceed 2.55 pounds per hour. Volatile organic compound (VOC) emissions shall not exceed 0.7 pound per hour. See b)(2)a. below.
b.	OAC rule 3745-31-05(D) [Synthetic Minor to avoid Title V and 40 CFR Part 63, Subparts FFFF, PPPP, and HHHHH]	See sections B.2. through B.5. of the Facility-Wide Terms and Conditions.
c.	OAC rule 3745-114-01	See d)(1) through d)(4) and e)(2) below.

(2) Additional Terms and Conditions

a. The hourly OC and VOC emission limitations regulated per OAC rule 3745-31-05(A)(3) are based on the emissions unit's potential to emit. Therefore, no record keeping or reporting is required to demonstrate compliance with these emission limitations.

However, if any proposed change(s), such as with production capacity, the types and/or quantities of materials used or processed, or anything else that increases the potential emissions of any air pollutant, then the permittee shall apply for and obtain either a modification to the federally enforceable permit-to-install and operate (FEPTIO) or a new final FEPTIO prior to the change(s).

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permit to install (PTI) application for this emissions unit, P025, 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 emissions unit 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, (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, 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: Xylene
TLV (mg/m3): 434
Maximum Hourly Emission Rate (lbs/hr): 0.55
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 45.76
MAGLC (ug/m3): 10,333

The permittee, has demonstrated that emissions of xylene, from emissions unit P025, is calculated to be less than 80% 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).

(2) Prior to making any physical changes to or changes in the method of operation of the emissions unit, 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 or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "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.

(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 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) For additional monitoring and/or record keeping requirements, see section B.3. of the Facility-Wide Terms and Conditions.

e) Reporting Requirements

(1) 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.

(2) The permittee shall include in the annual PER 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. If no changes to the emissions, emissions unit or the exhaust stack have been made, then the report shall include a statement to this effect.

(3) 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.

(4) For additional reporting requirements, see section B.4. of the Facility-Wide Terms and Conditions.

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. <u>Emission Limitation</u>:

OC emissions shall not exceed 2.55 pounds per hour.

<u>Applicable Compliance Method</u>:

Compliance with the hourly allowable OC emission limitation identified above shall be demonstrated by multiplying the emission factor of 0.51 pound of OC per tank washed* by the maximum hourly rate (5 tanks per hour).

*The OC emission factor was derived in the document entitled “Tank Washing (P025) Emission Calculations” dated November 4, 2005 provided in the permit application for PTI 16-02430.

b. <u>Emission Limitation</u>:

VOC emissions shall not exceed 0.7 pound per hour.

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitation identified above shall be demonstrated by multiplying the emission factor of 0.14 pound of VOC per tank washed* by the maximum hourly rate (5 tanks per hour).

*The VOC emission factor was derived in the document entitled "Tank Washing (P025) Emission Calculations" dated November 4, 2005 provided in the permit application for PTI 16-02430.

g) Miscellaneous Requirements

(1) None.

4. P060, Ball Mill

Operations, Property and/or Equipment Description:

Equipment for grinding pigments, resins, and solvents to make paint pastes - Ball Mill

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

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

a. None.

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

a. b)(1)e.

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 3745-17-07(A)(1)	Visible particulate emissions (PE) from the stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
b.	OAC rule 3745-17-07(B)(1)	Visible PE of fugitive dust shall not exceed 20% opacity as a 3-minute average.
c.	OAC rule 3745-17-08(B)(3)	See b)(2)a. and b)(2)b. below.
d.	OAC rule 3745-17-11(B)(1)	PE shall not exceed 3.53 pounds per hour.
e.	OAC rule 3745-31-05(D) [Synthetic Minor to avoid Title V and 40 CFR Part 63, Subparts FFFF, PPPP, and HHHHH]	See sections B.2. through B.5. of the Facility-Wide Terms and Conditions.

(2) Additional Terms and Conditions

a. The PE from this emissions unit shall be vented to the baghouse at all times the emissions unit is in operation and using powder raw materials (particulate emission producing).

b. 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 emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design; and

ii. the control equipment for this emissions unit shall achieve an outlet emission rate of not greater than 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases or there shall be no visible particulate emissions (whichever is less stringent) from the exhaust stack of this emissions unit.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the baghouse is between 0.1 to 5.0 inches of water.

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

(3) 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.

(4) This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or Local Air Agency. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit. 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.

(5) The permittee shall perform quarterly checks, when the emissions unit is in operation and when weather conditions allow, for any visible particulate emissions from the baghouse stack and any visible emissions of fugitive dust from the non-stack 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 quarterly in an operations log. If visible emissions are observed, the permittee shall also note the following in an 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 event; and

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

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item d)(5)d. above or continue the quarterly check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions units). 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 units continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

(6) For additional monitoring and/or record keeping requirements, see section B.3. of the Facility-Wide Terms and Conditions.

e) Reporting Requirements

(1) 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.

(2) The permittee shall identify in the annual PER the following information concerning the operations of the baghouse during the 12-month reporting period for this emissions unit:

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 was in operation and using powder raw materials (particulate emission producing) and the process emissions were not vented to the baghouse;

c. each incident of deviation described in e)(2)a. above where a prompt investigation was not conducted;

d. each incident of deviation described in e)(2)a. above 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 e)(2)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 the following information in the annual PER in accordance with the monitoring requirements located in section d)(5) above:

a. each quarterly check during which any visible particulate emissions were observed from any stack;

b. each quarterly check during which any visible fugitive particulate emissions were observed from any non-stack egress point (i.e., building windows, doors, roof monitors, etc.); and

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

(4) 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.

(5) For additional reporting requirements, see section B.4. of the Facility-Wide Terms and Conditions.

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. <u>Emission Limitation</u>:

Visible PE from the stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

<u>Applicable Compliance Method</u>:

If required, compliance with the stack opacity limitation identified above shall be determined through visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A.

b. <u>Emission Limitation</u>:

Visible PE of fugitive dust shall not exceed 20% opacity as a 3-minute average.

Applicable Compliance Method:

If required, compliance with the fugitive opacity limitation identified above shall be determined through visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A and the procedures specified in OAC rule 3745-17-03(B)(3).

c. Emission Limitation:

The controlled emissions from the stack shall achieve an outlet emission rate of not greater than 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases, or there shall be no visible emissions from the exhaust stack.

Applicable Compliance Methods:

Compliance with the requirement for no visible particulate emissions from the exhaust stack, identified in this permit, shall be determined in accordance with Method 22 of 40 CFR Part 60, Appendix A. If opting to comply with the outlet particulate emissions rate, compliance with the 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases from the stack shall be determined in accordance with Methods 1 through 5 of 40 CFR Part 60, Appendix A.

d. Emission Limitation:

PE shall not exceed 3.53 pounds per hour

Applicable Compliance Method:

Compliance with the hourly allowable PE limitation identified above shall be demonstrated by multiplying the emission factor of 20 pounds of PE per ton of dry pigment (AP-42 Table 6.4-1, dated 5/83) by the maximum hourly amount of dry pigment (ton(s) per hour) and the overall control efficiency of the baghouse (1-0.9).

If required, compliance with the hourly allowable PE limitation above shall be determined based on emissions testing conducted in accordance with U.S. EPA Methods 1 through 5 of 40 CFR Part 60, Appendix A.

g) Miscellaneous Requirements

(1) None.

5. Emissions Unit Group - Filling Lines Group 1: P002, P003, P004, P005

EU ID	Operations, Property and/or Equipment Description
P002	Aerosol Gassing Equipment - Kartridge Pak 9 - Head under-cap gasser/crimper - Filling Line #1
P003	Aerosol Gassing Equipment - Kartridge Pak 9 - Head under-cap gasser/crimper - Filling Line #2
P004	Aerosol Gassing Equipment - Kartridge Pak 6 - Head under-cap gasser/crimper - Filling Line #3
P005	Aerosol Gassing Equipment - Terco index filler - Filling Line #4

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

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

a. None.

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

a. b)(1)a.

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(D) [Synthetic Minor to avoid Title V and 40 CFR Part 63, Subparts FFFF, PPPP, and HHHHH]	See sections B.2. through B.5. of the Facility-Wide Terms and Conditions.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) For additional monitoring and/or record keeping requirements, see section B.3. of the Facility-Wide Terms and Conditions.

e) Reporting Requirements

(1) 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.

(2) 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.

(3) For additional reporting requirements, see section B.4. of the Facility-Wide Terms and Conditions.

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. None.

g) Miscellaneous Requirements

(1) None.

6. Emissions Unit Group - Filling Lines Group 2: P047, P048, P049

EU ID	Operations, Property and/or Equipment Description
P047	Inline filling of half-pint and quart containers - Filling Line #5
P048	Inline filling of 1-gallon containers - Filling Line #6
P049	Inline filling of 5-gallon containers - Filling Line #7

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)d., d)(1) through d)(4), and e)(2).

(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) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/2001	For emissions unit P047: volatile organic compound (VOC) emissions shall not exceed 0.14 tons per month averaged over a 12-month rolling period. For emissions unit P048: VOC emissions shall not exceed 0.18 tons per month averaged over a 12-month rolling period. For emissions unit P049: VOC emissions shall not exceed 0.09 tons per month averaged over a 12-month rolling period. See b)(2)a. and b)(2)b. below.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-31-05(A)(3), as effective 12/01/2006	See b)(2)c. below.
c.	OAC rule 3745-31-05(D) [Synthetic Minor to avoid Title V and 40 CFR Part 63, Subparts FFFF, PPPP, and HHHHH]	See sections B.2. through B.5. of the Facility-Wide Terms and Conditions.
d.	OAC rule 3745-114-01	See d)(1) through d)(4) and e)(2) below.

(2) Additional Terms and Conditions

a. The VOC emission limitations regulated per OAC rule 3745-31-05(A)(3) are based on each emissions unit's potential to emit. Therefore, no record keeping or reporting is required to demonstrate compliance with these emission limitations.

However, if any proposed change(s), such as with production capacity, the types and/or quantities of materials used or processed, or anything else that increases the potential emissions of any air pollutant, then the permittee shall apply for and obtain either a modification to the federally enforceable permit-to-install and operate (FEPTIO) or a new final FEPTIO prior to the change(s).

b. 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.

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

The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from these air contaminant sources since the uncontrolled potential to emit for VOC from each of these air contaminant sources is less than 10 tons per year.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The Permit to Install (PTI) application for emissions units, P018, P019, P020, P047, P048, P049, P050, P051, P052, P053, P054, P055, P056 and P057, was evaluated based on the actual materials and the design parameters of the emissions units' exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to these emissions units 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 units, (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):

$$TLV/10 \times 8/X \times 5/Y = 4\ TLV/XY = MAGLC$$

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: Toluene (Cumene, Ethyl Benzene, Methanol, Methyl Isobutyl Ketone and Xylene)
TLV (mg/m3): 75
Maximum Hourly Emission Rate (lbs/hr): 32.64
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1013
MAGLC (ug/m3): 1786

Toxic Contaminant: 2-ethoxyethanol
TLV (mg/m3): 18.42
Maximum Hourly Emission Rate (lbs/hr): 1.50
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 46
MAGLC (ug/m3): 439

The permittee, has demonstrated that emissions of toluene (cumene, ethyl benzene, methanol, methyl isobutyl ketone and xylene) and 2-ethoxyethanol, from emissions units P047, P048, and P049 is calculated to be less than 80% 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).

(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 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.

(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) For additional monitoring and/or record keeping requirements, see section B.3. of the Facility-Wide Terms and Conditions.

e) Reporting Requirements

(1) 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.

(2) The permittee shall include in the annual PER 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. If no changes to the emissions, emissions unit or the exhaust stack have been made, then the report shall include a statement to this effect.

(3) 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.

(4) For additional reporting requirements, see section B.4. of the Facility-Wide Terms and Conditions.

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. <u>Emission Limitations:</u>

For emissions unit P047: VOC emissions shall not exceed 0.14 tons per month averaged over a 12-month rolling period.

For emissions unit P048: VOC emissions shall not exceed 0.18 tons per month averaged over a 12-month rolling period.

For emissions unit P049: VOC emissions shall not exceed 0.09 tons per month averaged over a 12-month rolling period.

<u>Applicable Compliance Methods</u>:

Compliance with the monthly allowable VOC emission limitations identified above shall be demonstrated by multiplying the emission factor of 0.000622 pound of VOC per gallon of paint produced* by the maximum hourly production rate (gallons per hour) and 8,760 hours per year, and then dividing by 2,000 pounds per ton and 12 months per year.

*Emission factor is the worst-case derived emission factor as calculated using EIIP Preferred and Alternative Methods for Estimating Air Emissions Volume II, Chapter 8, Section 4, equation 8.4-1.

g) Miscellaneous Requirements

(1) None.

7. Emissions Unit Group - Large Mixing Tanks: P018, P019, P020, P050, P051, P052, P053, P054, P055, P056, P057

EU ID	Operations, Property and/or Equipment Description
P018	1100 gallon mixing tank - L2 Large Mixing Tank
P019	1100 gallon mixing tank - L4 Large Mixing Tank
P020	1900 gallon mixing tank - L3 Large Mixing Tank
P050	1900 gallon mixing tank - L1 Large Mixing Tank
P051	1500 gallon mixing tank - L5 Large Mixing Tank
P052	1500 gallon mixing tank - L6 Large Mixing Tank
P053	1500 gallon mixing tank - L7 Large Mixing Tank
P054	1500 gallon mixing tank - L8 Large Mixing Tank
P055	1500 gallon mixing tank - L9 Large Mixing Tank
P056	1500 gallon mixing tank - L10 Large Mixing Tank
P057	1500 gallon mixing tank - L11 Large Mixing Tank

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)g., d)(7) through d)(10), and e)(5).

(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)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)	For emissions units P018 and P019: Volatile organic compound (VOC) emissions from each emissions unit shall not exceed 4.89 tons per month averaged over a 12-month rolling period. For emission units P020 and P050: VOC emissions from each emissions unit shall not exceed 8.47 tons per month averaged over a 12-month rolling period. For emissions units P051, P052, P053, P054, P055, P056 and P057: VOC emissions from each emissions unit shall not exceed 6.68 tons per month averaged over a 12-month rolling period. See b)(2)a. and b)(2)b. below.
b.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions (PE) from the stacks serving these emissions units shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
c.	OAC rule 3745-17-07(B)(1)	Visible PE of fugitive dust shall not exceed 20% opacity as a 3-minute average.
d.	OAC rule 3745-17-08(B)(3)	See b)(2)c. and b)(2)d. below.
e.	OAC rule 3745-17-11(B)(1)	Stack PE from emissions units P018, P019, P020, P050, P051, P052, P053, P054, P055, P056 and P057, combined, shall not exceed 34.5 pounds per hour.
f.	OAC rule 3745-31-05(D) [Synthetic Minor to avoid Title V and 40 CFR Part 63, Subparts FFFF, PPPP, and HHHHH]	See sections B.2. through B.5. of the Facility-Wide Terms and Conditions. See b)(2)e. below [PE limitation to avoid Nonattainment NSR for PM 2.5 and State and Federal Modeling Requirements].
g.	OAC rule 3745-114-01	See d)(7) through d)(10) and e)(5) below.

(2) Additional Terms and Conditions

a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-11.

b. The monthly average VOC emission limitations regulated per OAC rule 3745-31-05(A)(3) are based on each emissions unit's potential to emit. Therefore, no record keeping or reporting is required to demonstrate compliance with these emission limitations.

However, if any proposed change(s), such as with production capacity, the types and/or quantities of materials used or processed, or anything else that increases the potential emissions of any air pollutant, then the permittee shall apply for and obtain either a modification to the federally enforceable permit-to-install and operate (FEPTIO) or a new final FEPTIO prior to the change(s).

c. The PE from the emissions units listed above shall be vented to a baghouse when one or more of the emissions units are in operation and using powder raw materials (particulate emission producing).

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 emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design; and

ii. the control equipment for this emissions unit shall achieve an outlet emission rate of not greater than 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases or there shall be no visible particulate emissions (whichever is less stringent) from the exhaust stack of this emissions unit.

e. The PE* from emissions units P018, P019, P020, P050, P051, P052, P053, P054, P055, P056 and P057, combined, shall not exceed 9.9 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

*Particulate emissions are equal to PM-10 and PM 2.5.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across each baghouse is between 0.1 to 5.0 inches of water.

(2) The permittee shall properly install, operate and maintain equipment to continuously monitor the pressure drop, in inches of water, across each baghouse when the controlled emissions unit(s) is/are in operation and using powder raw materials (particulate emission producing), including periods of startup and shutdown. The permittee shall record the pressure drop across each baghouse on a daily basis. The monitoring equipment shall be installed, calibrated, operated and maintained in

accordance with the manufacturer's recommendations, instructions and operating manual(s), with any modifications deemed necessary by the permittee.

(3) 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.

(4) This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or Local Air Agency. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit. 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.

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

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

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item d)(5)d. above or continue the quarterly check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions units). 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 units continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

(6) The permittee shall collect and record the following information each month for emissions units P018, P019, P020, P050, P051, P052, P053, P054, P055, P056 and P057, combined:

a. the amount of paint produced, in pounds per month;

b. the PE, in ton(s) per month [i.e., d)(6)a. times the maximum weight percent of powder raw materials per batch of paint (0.32) divided by 2,000 pounds per ton times the emission factor of 20 pounds per ton of ingredients in powder form (AP-42 Table 6.4-1) times the overall control efficiency of each baghouse (1-0.8991), and then divide by 2,000 pounds per ton]; and

c. the rolling, 12-month summation of the particulate emissions.

(7) The Permit to Install (PTI) application for emissions units, P018, P019, P020, P047, P048, P049, P050, P051, P052, P053, P054, P055, P056 and P057, was evaluated based on the actual materials and the design parameters of the emissions units' exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to these emissions units 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 units, (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: Toluene (Cumene, Ethyl Benzene, Methanol, Methyl Isobutyl Ketone and Xylene)
   TLV (mg/m3): 75
   Maximum Hourly Emission Rate (lbs/hr): 32.64
   Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1013
   MAGLC (ug/m3): 1786

   Toxic Contaminant: 2-ethoxyethanol
   TLV (mg/m3): 18.42

Maximum Hourly Emission Rate (lbs/hr): 1.50
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 46
MAGLC (ug/m3): 439

The permittee, has demonstrated that emissions of toluene (cumene, ethyl benzene, methanol, methyl isobutyl ketone and xylene) and 2-ethoxyethanol, from emissions units P018, P019, P020, P050, P051, P052, P053, P054, P055, P056 and P057, is calculated to be less than 80% 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).

(8) 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.

(9) 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.

(10) 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.

(11) For additional monitoring and/or record keeping requirements, see section B.3. of the Facility-Wide Terms and Conditions.

e) Reporting Requirements

(1) 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. PE from emissions units P018, P019, P020, P050, P051, P052, P053, P054, P055, P056 and P057, combined, shall not exceed 9.9 tons per year, based upon a rolling, 12-month summation of the monthly emissions;

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).

(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 in the annual PER the following information concerning the operations of the baghouse during the 12-month reporting period for this emissions unit:

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 was in operation and using powder raw materials (particulate emission producing) and the process emissions were not vented to the baghouse;

c. each incident of deviation described in e)(3)a. above where a prompt investigation was not conducted;

d. each incident of deviation described in e)(3)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 e)(3)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.

(4) The permittee shall identify the following information in the annual PER in accordance with the monitoring requirements located in section d)(5) above:

a. each quarterly check during which any visible particulate emissions were observed from any stack;

b. each quarterly check during which any visible fugitive particulate emissions were observed from any non-stack egress point (i.e., building windows, doors, roof monitors, etc.); and

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

(5) The permittee shall include in the annual PER 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. If no changes to the emissions, emissions unit or the exhaust stack have been made, then the report shall include a statement to this effect.

(6) 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.

(7) For additional reporting requirements, see section B.4. of the Facility-Wide Terms and Conditions.

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. <u>Emission Limitations</u>:

For emissions units P018 and P019: VOC emissions from each emissions unit shall not exceed 4.89 tons per month averaged over a 12-month rolling period.

For emission units P020 and P050: VOC emissions from each emissions unit shall not exceed 8.47 tons per month averaged over a 12-month rolling period.

For emissions units P051, P052, P053, P054, P055, P056 and P057: VOC emissions from each emissions unit shall not exceed 6.68 tons per month averaged over a 12-month rolling period.

<u>Applicable Compliance Method</u>:

Compliance with the monthly allowable VOC emission limitations identified above shall be demonstrated by multiplying the VOC emission factor of 0.012209 pound of VOC per gallon of paint produced* by the maximum hourly production rate (gallons per hour) and 8,760 hours per year, and then dividing by 2,000 pounds per ton and 12 months per year.

*Emission factor is the worst-case derived emission factor as calculated using EIIP Preferred and Alternative Methods for Estimating Air Emissions Volume II, Chapter 8, Section 4, equation 8.4-1 and equation 8.4-22.

b. Emission Limitation:

Visible PE from the stacks serving these emissions units shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance with the stack opacity limitation identified above shall be determined through visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A.

c. Emission Limitation:

Visible PE of fugitive dust shall not exceed 20% opacity as a 3-minute average.

Applicable Compliance Method:

If required, compliance with the fugitive opacity limitation identified above shall be determined through visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A and the procedures specified in OAC rule 3745-17-03(B)(3).

d. Emission Limitation:

The controlled emissions from the stack shall achieve an outlet emission rate of not greater than 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases, or there shall be no visible emissions from the exhaust stack.

Applicable Compliance Methods:

Compliance with the requirement for no visible particulate emissions from the exhaust stack, identified in this permit, shall be determined in accordance with Method 22 of 40 CFR Part 60, Appendix A. If opting to comply with the outlet particulate emissions rate, compliance with the 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases from the stack shall be determined by emissions testing performed in accordance with Methods 1 through 5 of 40 CFR Part 60, Appendix A.

e. Emission Limitation:

Stack PE from emissions units P018, P019, P020, P050, P051, P052, P053, P054, P055, P056 and P057, combined, shall not exceed 34.5 pounds per hour.

Applicable Compliance Method:

If required, compliance with the hourly allowable PE limitation above shall be determined based on the results of emissions testing conducted in accordance with U.S. EPA Methods 1 through 5 of 40 CFR Part 60, Appendix A.

f. Emission Limitation:

PE from emissions units P018, P019, P020, P050, P051, P052, P053, P054, P055, P056 and P057, combined, shall not exceed 9.9 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance with the allowable rolling 12-month PE limitation identified above shall be demonstrated based on the record keeping requirements in d)(6).

g) Miscellaneous Requirements

(1) None.

8. Emissions Unit Group - Paint Mixing Stations Group 1: P011, P012

EU ID	Operations, Property and/or Equipment Description
P011	Paint making equipment comprising of high speed disperser, 250 gal. capacity or less mixing vessel, measuring scale, and raw material metering system - Paint Mixing Station #3
P012	Paint making equipment comprising of high speed disperser, 250 gal. capacity or less mixing vessel, measuring scale, and raw material metering system - Paint Mixing Station #7

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)c., d)(1) through d)(4), and e)(2).

(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)b.

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)	For emissions units P011 and P012: organic compound (OC) emissions from each emissions unit shall not exceed 3.93 pounds per hour. See b)(2)a. and b)(2)b. below.
b.	OAC rule 3745-31-05(D) [Synthetic Minor to avoid Title V and 40 CFR Part 63, Subparts FFFF, PPPP, and HHHHH]	See sections B.2. through B.5. of the Facility-Wide Terms and Conditions.
c.	OAC rule 3745-114-01	See d)(1) through d)(4), and e)(2) below.

(2) Additional Terms and Conditions

a. The permittee shall employ a cover to reduce solvent evaporation losses.

b. The hourly OC emission limitations regulated per OAC rule 3745-31-05(A)(3) are based on each emissions unit's potential to emit. Therefore, no record keeping or reporting is required to demonstrate compliance with these emission limitations.

However, if any proposed change(s), such as with production capacity, the types and/or quantities of materials used or processed, or anything else that increases the potential emissions of any air pollutant, then the permittee shall apply for and obtain either a modification to the federally enforceable permit-to-install and operate (FEPTIO) or a new final FEPTIO prior to the change(s)

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The Permit to Install (PTI) application for emissions units, P009 through P017, was evaluated based on the actual materials and the design parameters of the emissions units' exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to these emissions units 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 units, (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):

Pollutant: Toluene
TLV (mg/m3): 75
Maximum Hourly Emission Rate (lbs/hr): 0.81
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 642.4
MAGLC (ug/m3): 1786

Pollutant: Cyclohexane
TLV (mg/m3): 344
Maximum Hourly Emission Rate (lbs/hr): 0.73
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 878.1
MAGLC (ug/m3): 8192

Pollutant: Methanol
TLV (mg/m3): 262
Maximum Hourly Emission Rate (lbs/hr): 0.66
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 1083
MAGLC (ug/m3): 6238.1

Pollutant: Methyl Methacrylate
TLV (mg/m3): 205
Maximum Hourly Emission Rate (lbs/hr): 0.29
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 336.8
MAGLC (ug/m3): 4881

The permittee, has demonstrated that emissions of toluene, cyclohexane, methanol, and methyl methacrylate, from emissions units P009 through P017, is calculated to be less than 80% 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).

(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 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.

(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) For additional monitoring and/or record keeping requirements, see section B.3. of the Facility-Wide Terms and Conditions.

e) Reporting Requirements

(1) 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.

(2) The permittee shall include in the annual PER 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. If no changes to the emissions, emissions unit or the exhaust stack have been made, then the report shall include a statement to this effect.

(3) 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.

(4) For additional reporting requirements, see section B.4. of the Facility-Wide Terms and Conditions.

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:

For emissions units P011 and P012: OC emissions from each emissions unit shall not exceed 3.93 pounds per hour.

Applicable Compliance Method:

Compliance with the hourly allowable OC emission limitation identified above shall be demonstrated by multiplying the emission factor of 0.0157 pound of OC per gallon of paint produced* by the maximum hourly production rate (gallons per hour).

*Emission factor is the worst-case derived emission factor as calculated using EIIP Preferred and Alternative Methods for Estimating Air Emissions Volume II, Chapter 8, Section 4, equation 8.4-1 and equation 8.4-22.

g) Miscellaneous Requirements

(1) None.

9. Emissions Unit Group - Paint Mixing Stations Group 2: P009, P010, P013, P014, P015, P016, P017

EU ID	Operations, Property and/or Equipment Description
P009	Paint making equipment comprising of high speed disperser, 250 gal. capacity or less mixing vessel, measuring scale, and raw material metering system - Paint Mixing Station #1
P010	Paint making equipment comprising of high speed disperser, 250 gal. capacity or less mixing vessel, measuring scale, and raw material metering system - Paint Mixing Station #2
P013	Paint making equipment comprising of high speed disperser and 250 gal. capacity or less mixing vessel - Paint Mixing Station #4
P014	Paint making equipment comprising of high speed disperser and 250 gal. capacity or less mixing vessel - Paint Mixing Station #9
P015	Paint making equipment comprising of high speed disperser and 250 gal. capacity or less mixing vessel - Paint Mixing Station #12
P016	Paint making equipment comprising of high speed disperser and 250 gal. capacity or less mixing vessel - Paint Mixing Station #13
P017	Paint making equipment comprising of high speed disperser and 250 gal. capacity or less mixing vessel - Paint Mixing Station #14

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)g., d)(6) through d)(9), 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)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)	Organic compound (OC) emissions from each emissions unit shall not exceed 3.93 pounds per hour. Particulate emissions (PE) from each emissions unit shall not exceed 0.86 pound per hour and 3.77 tons per year. See b)(2)a. through b)(2)c. below.
b.	OAC rule 3745-17-07(A)(1)	Visible PE from the stack serving each emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
c.	OAC rule 3745-17-07(B)(1)	Visible PE of fugitive dust shall not exceed 20% opacity as a 3-minute average.
d.	OAC rule 3745-17-08(B)(3)	See b)(2)d. below.
e.	OAC rule 3745-17-11(B)(1)	See b)(2)e. below.
f.	OAC rule 3745-31-05(D) [Synthetic Minor to avoid Title V and 40 CFR Part 63, Subparts FFFF, PPPP, and HHHHH]	See sections B.2. through B.5. of the Facility-Wide Terms and Conditions.
g.	OAC rule 3745-114-01	See d)(6) through d)(9), and e)(4) below.

(2) Additional Terms and Conditions

a. The PE from the emissions units listed above shall be vented to a baghouse when one or more of the emissions units are in operation and using powder raw materials (particulate emission producing).

b. The permittee shall employ a cover to reduce solvent evaporation losses.

c. The hourly OC emission limitations and hourly and annual PE limitations regulated per OAC rule 3745-31-05(A)(3) are based on each emissions unit's potential to emit. Therefore, no record keeping or reporting is required to demonstrate compliance with these emission limitations.

However, if any proposed change(s), such as with production capacity, the types and/or quantities of materials used or processed, or anything else that increases the potential emissions of any air pollutant, then the permittee shall apply for and obtain either a modification to the federally enforceable permit-to-install and operate (FEPTIO) or a new final FEPTIO prior to the change(s).

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 emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design; and

ii. the control equipment for this emissions unit shall achieve an outlet emission rate of not greater than 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases or there shall be no visible particulate emissions (whichever is less stringent) from the exhaust stack of this emissions unit.

e. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across each baghouse is between 0.1 to 5.0 inches of water.

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

(3) 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.

(4) This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or Local Air Agency. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit. 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.

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

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

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item d)(5)d. above or continue the quarterly check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions units). 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 units continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

(6) The Permit to Install (PTI) application for these emissions units, P009 through P017, were evaluated based on the actual materials and the design parameters of the emissions units' exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to these emissions units 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 units, (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):

Pollutant: Toluene
TLV (mg/m3): 75
Maximum Hourly Emission Rate (lbs/hr): 0.81
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 642.4
MAGLC (ug/m3): 1786

Pollutant: Cyclohexane
TLV (mg/m3): 344
Maximum Hourly Emission Rate (lbs/hr): 0.73
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 878.1
MAGLC (ug/m3): 8192

Pollutant: Methanol
TLV (mg/m3): 262
Maximum Hourly Emission Rate (lbs/hr): 0.66
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 1083
MAGLC (ug/m3): 6238.1

Pollutant: Methyl Methacrylate
TLV (mg/m3): 205
Maximum Hourly Emission Rate (lbs/hr): 0.29
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 336.8
MAGLC (ug/m3): 4881

The permittee, has demonstrated that emissions of toluene, cyclohexane, methanol, and methyl methacrylate from emissions units P009 through P017, is calculated to be less than 80% 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).

(7) 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.

(8) 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.

(9) 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.

(10) For additional monitoring and/or record keeping requirements, see section B.3. of the Facility-Wide Terms and Conditions.

e) Reporting Requirements

(1) 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.

(2) The permittee shall identify in the annual PER the following information concerning the operations of the baghouse during the 12-month reporting period for this emissions unit:

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 was in operation and using powder raw materials (particulate emission producing) and the process emissions were not vented to the baghouse;

c. each incident of deviation described in e)(2)a. above where a prompt investigation was not conducted;

d. each incident of deviation described in e)(2)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 e)(2)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 the following information in the annual PER in accordance with the monitoring requirements located in section d)(5) above:

a. each quarterly check during which any visible particulate emissions were observed from any stack;

b. each quarterly check during which any visible fugitive particulate emissions were observed from any non-stack egress point (i.e., building windows, doors, roof monitors, etc.); and

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

(4) The permittee shall include in the annual PER 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. If no changes to the emissions, emissions unit or the exhaust stack have been made, then the report shall include a statement to this effect.

(5) 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.

(6) For additional reporting requirements, see section B.4. of the Facility-Wide Terms and Conditions.

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:

OC emissions from each emissions unit shall not exceed 3.93 pounds per hour.

Applicable Compliance Method:

Compliance with the hourly allowable OC emission limitation identified above shall be demonstrated by multiplying the emission factor of 0.0157 pound of OC per gallon of paint produced* by the maximum hourly production rate (gallons per hour).

*Emission factor is the worst-case derived emission factor as calculated using EIIP Preferred and Alternative Methods for Estimating Air Emissions Volume II, Chapter 8, Section 4, equation 8.4-1 and equation 8.4-22.

b. Emission Limitations:

PE from each emissions unit shall not exceed 0.86 pound per hour and 3.77 tons per year.

Applicable Compliance Methods:

Compliance with the hourly allowable PE limitation identified above shall be demonstrated by multiplying the emission factor of 20 pounds of PE per ton of dry pigment (AP-42 Table 6.4-1, dated 5/83) by the maximum hourly amount of

dry pigment (ton(s) per hour) and the overall control efficiency of the baghouse (1-0.9).

If required, compliance with the hourly allowable PE limitation above shall be determined based on the results of emissions testing conducted in accordance with U.S. EPA Methods 1 through 5 of 40 CFR Part 60, Appendix A.

The annual allowable PE limitation above was determined by multiplying the hourly allowable PE limitation by 8,760 hours per year, and then dividing by 2,000 pounds per ton. Therefore, as long as compliance with the hourly allowable emission limitation is maintained, compliance with the annual allowable emission limitation shall be assumed.

c. Emission Limitation:

Visible PE from the stack serving each emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance with the stack opacity limitation identified above shall be determined through visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A.

d. Emission Limitation:

Visible PE of fugitive dust shall not exceed 20% opacity as a 3-minute average.

Applicable Compliance Method:

If required, compliance with the fugitive opacity limitation identified above shall be determined through visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A and the procedures specified in OAC rule 3745-17-03(B)(3).

e. Emission Limitation:

The controlled emissions from the stack shall achieve an outlet emission rate of not greater than 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases, or there shall be no visible emissions from the exhaust stack.

Applicable Compliance Methods:

Compliance with the requirement for no visible particulate emissions from the exhaust stack, identified in this permit, shall be determined in accordance with Method 22 of 40 CFR Part 60, Appendix A. If opting to comply with the outlet particulate emissions rate, compliance with the 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases from the stack shall be determined by emissions testing performed in accordance with Methods 1 through 5 of 40 CFR Part 60, Appendix A.

g) Miscellaneous Requirements

(1) None.

10. Emissions Unit Group - Paint Mixing Stations Group 3: P022, P023, P024

EU ID	Operations, Property and/or Equipment Description
P022	Paint making equipment comprising of high speed disperser, 250 gal. capacity or less mixing vessel, measuring scale, and raw material metering system - Paint Mixing Station #5
P023	Paint making equipment comprising of high speed disperser, 250 gal. capacity or less mixing vessel, measuring scale, and raw material metering system - Paint Mixing Station #6
P024	Paint making equipment comprising of high speed disperser, 250 gal. capacity or less mixing vessel, measuring scale, and raw material metering system - Paint Mixing Station #8

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

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

a. None.

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

a. b)(1)e.

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 3745-17-07(A)(1)	Visible particulate emissions (PE) from the stack serving each emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
b.	OAC rule 3745-17-07(B)(1)	Visible PE of fugitive dust shall not exceed 20% opacity as a 3-minute average.
c.	OAC rule 3745-17-08(B)(3)	See b)(2)a. and b)(2)b. below.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-17-11(B)(1)	PE from each emissions unit shall not exceed 3.80 pounds per hour.
e.	OAC rule 3745-31-05(D) [Synthetic Minor to avoid Title V and 40 CFR Part 63, Subparts FFFF, PPPP, and HHHHH]	See sections B.2. through B.5. of the Facility-Wide Terms and Conditions.

(2) Additional Terms and Conditions

a. The emissions from the emissions units listed above shall be vented to a baghouse when one or more of the emissions units are in operation and using powder raw materials (particulate emission producing).

b. 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 emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design; and

ii. the control equipment for this emissions unit shall achieve an outlet emission rate of not greater than 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases or there shall be no visible particulate emissions (whichever is less stringent) from the exhaust stack of this emissions unit.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across each baghouse is between 0.1 to 5.0 inches of water.

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

(3) 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.

(4) This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or Local Air Agency. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit. 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.

(5) The permittee shall perform quarterly checks, when the emissions units are in operation and when weather conditions allow, for any visible particulate emissions from the

baghouse stack and any visible emissions of fugitive dust from the non-stack egress points (i.e., building windows, doors, roof monitors, etc.) serving these emissions units. The presence or absence of any visible emissions shall be noted quarterly in an operations log. If visible emissions are observed, the permittee shall also note the following in an 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 event; and

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

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item d)(5)d. above or continue the quarterly check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions units). 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 units continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

(6) For additional monitoring and/or record keeping requirements, see section B.3. of the Facility-Wide Terms and Conditions.

e) Reporting Requirements

(1) 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.

(2) The permittee shall identify in the annual PER the following information concerning the operations of the baghouse during the 12-month reporting period for this emissions unit:

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 was in operation and using powder raw materials (particulate emission producing) and the process emissions were not vented to the baghouse;

c. each incident of deviation described in e)(2)a. above where a prompt investigation was not conducted;

d. each incident of deviation described in e)(2)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 e)(2)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 the following information in the annual PER in accordance with the monitoring requirements located in section d)(5) above:

a. each quarterly check during which any visible particulate emissions were observed from any stack;

b. each quarterly check during which any visible fugitive particulate emissions were observed from any non-stack egress point (i.e., building windows, doors, roof monitors, etc.); and

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

(4) 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.

(5) For additional reporting requirements, see section B.4. of the Facility-Wide Terms and Conditions.

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. <u>Emission Limitation</u>:

Visible PE from the stack serving each emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance with the stack opacity limitation identified above shall be determined through visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A.

b. Emission Limitation:

Visible PE of fugitive dust shall not exceed 20% opacity as a 3-minute average.

Applicable Compliance Method:

If required, compliance with the fugitive opacity limitation identified above shall be determined through visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A and the procedures specified in OAC rule 3745-17-03(B)(3).

c. Emission Limitation:

The controlled emissions from the stack shall achieve an outlet emission rate of not greater than 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases, or there shall be no visible emissions from the exhaust stack.

Applicable Compliance Methods:

Compliance with the requirement for no visible particulate emissions from the exhaust stack, identified in this permit, shall be determined in accordance with Method 22 of 40 CFR Part 60, Appendix A. If opting to comply with the outlet particulate emissions rate, compliance with the 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases from the stack shall be determined by emissions testing performed in accordance with Methods 1 through 5 of 40 CFR Part 60, Appendix A.

d. Emission Limitation:

PE from each emissions unit shall not exceed 3.80 pounds per hour.

Applicable Compliance Method:

Compliance with the hourly allowable PE limitation identified above shall be demonstrated by multiplying the emission factor of 20 pounds of PE per ton of dry pigment (AP-42 Table 6.4-1, dated 5/83) by the maximum hourly amount of dry pigment (ton(s) per hour) and the overall control efficiency of the baghouse (1-0.9).

If required, compliance with the hourly allowable PE limitation above shall be determined through emissions testing conducted in accordance with U.S. EPA Methods 1 through 5 of 40 CFR Part 60, Appendix A.

g) Miscellaneous Requirements

(1) None.

11. Emissions Unit Group - Pre-Mix Stations: P029, P030

EU ID	Operations, Property and/or Equipment Description
P029	Pre-mix station to mix resins, pigments, and solvents together prior to being processed through the sand mill - Mill Pre-Mixing Station #1
P030	Pre-mix station to mix resins, pigments, and solvents together prior to being processed through the sand mill - Mill Pre-Mixing Station #2

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

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

a. b)(1)g. and g)(1).

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

a. b)(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)	Organic compound (OC) emissions from each emissions unit shall not exceed 1.97 pounds per hour. Particulate emissions (PE) from each emissions unit shall not exceed 0.43 pound per hour and 1.88 tons per year. Visible PE from any stack serving these emissions units shall not exceed 10% opacity, as a 6-minute average. See b)(2)a. and b)(2)b. below.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-17-07(A)(1)	See b)(2)c. below.
c.	OAC rule 3745-17-07(B)(1)	Visible PE of fugitive dust shall not exceed 20% opacity as a 3-minute average.
d.	OAC rule 3745-17-08(B)(3)	See b)(2)d. below.
e.	OAC rule 3745-17-11(B)(1)	See b)(2)c. below.
f.	OAC rule 3745-31-05(D) [Synthetic Minor to avoid Title V and 40 CFR Part 63, Subparts FFFF, PPPP, and HHHHH]	See sections B.2. through B.5. of the Facility-Wide Terms and Conditions.
g.	OAC rule 3745-114-01	See g)(1) below.

(2) Additional Terms and Conditions

a. The PE from the emissions units listed above shall be vented to a baghouse when one or more of the emissions units are in operation and using powder raw materials (particulate emission producing).

b. The hourly OC emission limitation and hourly and annual PE limitations regulated per OAC rule 3745-31-05(A)(3) are based on each emissions unit's potential to emit. Therefore, no record keeping or reporting is required to demonstrate compliance with these emission limitations.

However, if any proposed change(s), such as with production capacity, the types and/or quantities of materials used or processed, or anything else that increases the potential emissions of any air pollutant, then the permittee shall apply for and obtain either a modification to the federally enforceable permit-to-install and operate (FEPTIO) or a new final FEPTIO prior to the change(s).

c. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

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 emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design; and

ii. the control equipment for this emissions unit shall achieve an outlet emission rate of not greater than 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases or there shall be no visible particulate emissions (whichever is less stringent) from the exhaust stack of this emissions unit.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the baghouse is between 0.1 to 5.0 inches of water.

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

(3) 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.

(4) This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or Local Air Agency. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit. 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.

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

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

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item d)(5)d. above or continue the quarterly check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions units). 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 units continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

(6) For additional monitoring and/or record keeping requirements, see section B.3. of the Facility-Wide Terms and Conditions.

e) Reporting Requirements

(1) 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.

(2) The permittee shall identify in the annual PER the following information concerning the operations of the baghouse during the 12-month reporting period for this emissions unit:

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 was in operation and using powder raw materials (particulate emission producing) and the process emissions were not vented to the baghouse;

c. each incident of deviation described in e)(2)a. above where a prompt investigation was not conducted;

d. each incident of deviation described in e)(2)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 e)(2)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 the following information in the annual PER in accordance with the monitoring requirements located in section d)(5) above:

a. each quarterly check during which any visible particulate emissions were observed from any stack;

b. each quarterly check during which any visible fugitive particulate emissions were observed from any non-stack egress point (i.e., building windows, doors, roof monitors, etc.); and

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

(4) 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.

(5) For additional reporting requirements, see section B.4. of the Facility-Wide Terms and Conditions.

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:

OC emissions from each emissions unit shall not exceed 1.97 pounds per hour.

Applicable Compliance Method:

Compliance with the hourly allowable OC emission limitation identified above shall be demonstrated by multiplying the emission factor of 0.0157 pound of OC per gallon of paint produced* by the maximum hourly production rate (gallons per hour).

*Emission factor is the worst-case derived emission factor as calculated using EIIP Preferred and Alternative Methods for Estimating Air Emissions Volume II, Chapter 8, Section 4, equation 8.4-1 and equation 8.4-22.

b. Emission Limitations:

PE from each emissions unit shall not exceed 0.43 pound per hour and 1.88 tons per year.

Applicable Compliance Methods:

Compliance with the hourly allowable PE limitation identified above shall be demonstrated by multiplying the emission factor of 20 pounds of PE per ton of dry pigment (AP-42 Table 6.4-1, dated 5/83) by the maximum hourly amount of dry pigment (ton(s) per hour) and the overall control efficiency of the baghouse (1-0.9).

If required, compliance with the hourly allowable PE limitation above shall be determined through emissions testing conducted in accordance with U.S. EPA Methods 1 through 5 of 40 CFR Part 60, Appendix A.

The annual allowable PE limitation above was determined by multiplying the hourly allowable PE limitation by 8,760 hours per year, and then dividing by 2,000 pounds per ton. Therefore, as long as compliance with the hourly allowable emission limitation is maintained, compliance with the annual allowable emission limitation shall be assumed.

c. Emission Limitation:

Visible PE from the stack serving each emissions unit shall not exceed 10% opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance with the stack opacity limitation identified above shall be determined through visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A.

d. Emission Limitation:

Visible PE of fugitive dust shall not exceed 20% opacity as a 3-minute average.

Applicable Compliance Method:

If required, compliance with the fugitive opacity limitation identified above shall be determined through visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A and the procedures specified in OAC rule 3745-17-03(B)(3).

e. Emission Limitation:

The controlled emissions from the stack shall achieve an outlet emission rate of not greater than 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases, or there shall be no visible emissions from the exhaust stack.

Applicable Compliance Methods:

Compliance with the requirement for no visible particulate emissions from the exhaust stack, identified in this permit, shall be determined in accordance with Method 22 of 40 CFR Part 60, Appendix A. If opting to comply with the outlet particulate emissions rate, compliance with the 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases from the stack shall be determined by emissions testing performed in accordance with Methods 1 through 5 of 40 CFR Part 60, Appendix A.

g) Miscellaneous Requirements

(1) None.

12. Emissions Unit Group - Sand Mills: P061, P062, P063

EU ID	Operations, Property and/or Equipment Description
P061	Equipment using sand as a grinding media to achieve proper paint paste blend - Sand Mill #1
P062	Equipment using sand as a grinding media to achieve proper paint paste blend - Sand Mill #2
P063	Equipment using sand as a grinding media to achieve proper paint paste blend - Sand Mill #3

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

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

a. None.

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

a. b)(1)a.

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(D) [Synthetic Minor to avoid Title V and 40 CFR Part 63, Subparts FFFF, PPPP, and HHHHH]	See sections B.2. through B.5. of the Facility-Wide Terms and Conditions.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) For additional monitoring and/or record keeping requirements, see section B.3. of the Facility-Wide Terms and Conditions.

e) Reporting Requirements

(1) 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.

(2) 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.

(3) For additional reporting requirements, see section B.4. of the Facility-Wide Terms and Conditions.

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. None.

g) Miscellaneous Requirements

(1) None.