



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

Certified Mail

1/25/2016

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. John Dimino
 HA INTERNATIONAL LLC
 4243 SOUTH AVE
 Toledo, OH 43615

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0448011215
 Permit Number: P0119647
 Permit Type: Renewal
 County: Lucas

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**
- **What should you do if you notice a spill or environmental emergency?**

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.

What should you do if you notice a spill or environmental emergency?

Any spill or environmental emergency which may endanger human health or the environment should be reported to the Emergency Response 24-HOUR EMERGENCY SPILL HOTLINE toll-free at (800) 282-9378. Report non-emergency complaints to the appropriate district office or local air agency.

If you have any questions regarding your permit, please contact Toledo Department of Environmental Services at (419)936-3015 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



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

Cc: TDES



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
HA INTERNATIONAL LLC**

Facility ID:	0448011215
Permit Number:	P0119647
Permit Type:	Renewal
Issued:	1/25/2016
Effective:	1/25/2016
Expiration:	1/25/2021



Division of Air Pollution Control
Permit-to-Install and Operate
for
HA INTERNATIONAL LLC

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Final Permit-to-Install and Operate
HA INTERNATIONAL LLC
Permit Number: P0119647
Facility ID: 0448011215
Effective Date: 1/25/2016

Authorization

Facility ID: 0448011215
Application Number(s): A0054421
Permit Number: P0119647
Permit Description: Renewal of FEPTIO for refractory coating batch mixing plant
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 1/25/2016
Effective Date: 1/25/2016
Expiration Date: 1/25/2021
Permit Evaluation Report (PER) Annual Date: Apr 1 - Mar 31, Due May 15

This document constitutes issuance to:

HA INTERNATIONAL LLC
4243 SOUTH AVE
TOLEDO, OH 43615

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:

Toledo Department of Environmental Services
348 South Erie Street
Toledo, OH 43604
(419)936-3015

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: P0119647

Permit Description: Renewal of FEPTIO for refractory coating batch mixing plant

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

Emissions Unit ID:	P002
Company Equipment ID:	P002
Superseded Permit Number:	P0109726
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P005
Company Equipment ID:	P005
Superseded Permit Number:	P0109726
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P010
Company Equipment ID:	P010
Superseded Permit Number:	P0109726
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P011
Company Equipment ID:	P011
Superseded Permit Number:	P0109726
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P018
Company Equipment ID:	P018
Superseded Permit Number:	P0109726
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P019
Company Equipment ID:	P019
Superseded Permit Number:	P0109726
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P021
Company Equipment ID:	P021
Superseded Permit Number:	P0109726
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P025
Company Equipment ID:	NA
Superseded Permit Number:	P0109726
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P028
Company Equipment ID:	Fill Station 1
Superseded Permit Number:	P0117980
General Permit Category and Type:	Not Applicable



Final Permit-to-Install and Operate
HA INTERNATIONAL LLC
Permit Number: P0119647
Facility ID: 0448011215
Effective Date: 1/25/2016

Group Name: P022, P023

Emissions Unit ID:	P022
Company Equipment ID:	P022
Superseded Permit Number:	P0109726
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P023
Company Equipment ID:	P023
Superseded Permit Number:	P0109726
General Permit Category and Type:	Not Applicable



Final Permit-to-Install and Operate
HA INTERNATIONAL LLC
Permit Number: P0119647
Facility ID: 0448011215
Effective Date: 1/25/2016

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 being permanently shut down without first applying for and obtaining a permit pursuant to 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.



Final Permit-to-Install and Operate
HA INTERNATIONAL LLC
Permit Number: P0119647
Facility ID: 0448011215
Effective Date: 1/25/2016

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.
2. Facility-wide restrictions:
 - a) Applicable Emissions Limitations:
 - (1) Under the authority of OAC rule 3745-31-05(D):
 - (a) The combined Volatile Organic Compounds (VOC) emissions from all emission units at this facility shall not exceed 60 tons as a rolling, 12-month summation.
 - (b) The combined particulate emissions (PE) from all stacks of all emission units at this facility shall not exceed 39.6 tons as a rolling, 12-month summation.
 - (c) The combined facility-wide hazardous air pollutants (HAPs) emissions from all emission units at this facility shall not exceed 8.0 tons of individual HAP as a rolling, 12-month summation and 20.0 tons of any combination of HAPs as a rolling, 12-month summation.
 - b) Operational Restrictions
 - (1) None.
 - c) Monitoring and/or Recordkeeping Requirements:
 - (1) The permittee shall collect and record the following information monthly for the purpose of determining compliance with the rolling, 12-month VOC emission limitation for all emissions units facility-wide:
 - (a) the company identification for each VOC-containing product transferred and/or manufactured;
 - (b) the number of tons of all VOC-containing liquid organic materials mixed where the vapor pressure of the VOC-containing liquid organic materials is less than or equal to 1.9 kPa;

- (c) the number of tons of all VOC-containing liquid organic materials mixed where the vapor pressure of the VOC-containing liquid organic materials is greater than 1.9 kPa;
 - (d) the number of tons of all VOC-containing liquid organic materials that are only transferred;
 - (e) the monthly VOC emissions from all VOC-containing liquid organic materials mixed where the vapor pressure of the VOC-containing liquid organic material is less than or equal to 1.9 kPa, calculated by multiplying the monthly tons of VOC-containing liquid organic material less than or equal to 1.9 kPa ((b) above) times the emission factor derived from a mass balance study performed at the facility on November 8, 2011 for liquid organic material with a vapor pressure less than or equal to 1.9 kPa being mixed with the powdered ingredients (0.005 pound VOC per pound solvent used), in tons per month;
 - (f) the monthly VOC emissions from all VOC-containing liquid organic materials mixed where the vapor pressure of the VOC-containing liquid organic material is greater than 1.9 kPa, calculated by multiplying the monthly tons of VOC-containing liquid organic material greater than 1.9 kPa ((c) above) times the emission factor specified in STAAPA/ALAPCO/USEPA reference document Methods for Estimating Air Emissions from Paint, Ink and Other Coating Manufacturing Facilities, page 8.5-4, dated February 2005 for liquid organic material with a vapor pressure greater than 1.9 kPa being mixed with the powdered ingredients (0.034 pound VOC per pound solvent used), in tons per month;
 - (g) the monthly total VOC emissions from all VOC-containing liquid organic materials that were transferred only, calculated by multiplying the monthly tons of all VOC-containing liquid organic material transferred ((d) above) times one-third the emission factor specified in the STAAPA/ALAPCO/USEPA reference document Methods for Estimating Air Emissions from Paint, Ink and Other Coating Manufacturing Facilities, page 8.5-4, dated February 2005 for organic materials transferred (0.011 pound VOC per pound of organic material transferred), in tons per month; and
 - (h) the facility-wide rolling, 12-month summation of VOC emissions for all emissions units, calculated by summing the current month's VOC emissions from all the emissions units ((e) + (f) + (g) above) to VOC emissions from the preceding eleven months from all the emissions units at this facility, in tons per rolling, 12-month period.
- This facility has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the emissions, upon issuance of this permit.
- (2) The permittee shall collect and record the following information monthly for the purpose of determining compliance with the rolling, 12-month PE limitation for all emissions units facility-wide:

- (a) The company identification for each product manufactured or container filled with dry material;
- (b) The amount of dry material mixed in each batch manufactured, in tons;
- (c) The amount of dry material filled in each container, in tons;
- (d) The total amount of all dry materials mixed and filled ($\sum(b) + \sum(c)$ above), in tons per month;
- (e) The monthly total PE emissions from the stacks for all dry materials mixed and dry material containers filled, calculated by multiplying the amount of dry materials mixed and containers filled with dry material ((d) above) times the emission factor specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 6.4-1, dated 1/95 (20 pounds of PE emissions per ton of dry materials mixed) times the particulate control's capture efficiency (0.95) times one minus the particulate control's control efficiency (1-0.99) divided by 2000 pounds per ton, in tons per month; and
- (f) The combined facility-wide rolling, 12-month summation of the stack particulate emissions for all emissions units, calculated by adding the current month's PE emissions from the stacks in all emissions units at this facility ((e) above) to the PE emissions for the preceding eleven calendar months from all the emissions units at this facility, in tons per rolling, 12-month period.

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

- (3) The permittee shall collect and record the following information monthly for the purpose of determining compliance with the rolling, 12-month HAP limitations for all emissions units facility-wide:
 - (a) The company identification of each HAP containing material mixed or transferred;
 - (b) The number of pounds of each HAP containing dry solid material mixed or transferred, in pounds per month;
 - (c) The number of gallons of each HAP containing liquid material mixed or transferred, in gallons per month;
 - (d) The individual HAP content of each HAP containing material, in pounds per gallon or pounds per pound as appropriate;
 - (e) The monthly emissions of each individual HAP, calculated as the summation of the number of pounds of dry solid material containing the individual HAP ((b) above) in pounds per month times the individual HAP content in pounds per pound for that dry solid material ((d) above) plus the product of the number of gallons of each liquid material for each individual HAP ((c) above) times the individual HAP content of that HAP containing liquid material in pounds per gallon ((d) above) times the emission factor specified in

STAAPA/ALAPCO/USEPA reference document Methods for Estimating Air Emissions from Paint, Ink and Other Coating Manufacturing Facilities, page 8.5-4, dated February 2005 (0.034 pound HAP emitted per pound HAP mixed), in pounds of each individual HAP per month;

- (f) The monthly emissions of the combined HAPs, calculated as the summation of each individual HAP for the month ($\sum(e)$ above), in pounds of combined HAPs per month;
- (g) The facility-wide rolling, 12-month summation of each individual HAP emissions for all emissions units, calculated by adding the current month's individual HAP emissions in all emissions units at this facility ((e) above) to the individual HAP emissions for the preceding eleven calendar months from all the emissions units at this facility, in tons per rolling, 12-month period for each HAP.
- (h) The facility-wide rolling, 12-month summation of the combined HAPs emissions for all emissions units, calculated by adding the current month's combined HAPs emissions in all emissions units at this facility ((f) above) to the combined HAPs emissions for the preceding eleven calendar months from all the emissions units at this facility, in tons per rolling, 12-month period for all HAPs combined.

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

d) Reporting Requirements:

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - (a) all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - 60 tons of VOC as a rolling, 12-month summation facility-wide
 - 39.6 tons of PE as a rolling, 12-month summation facility-wide
 - 8.0 tons of individual HAP as a rolling, 12-month summation facility-wide
 - 20.0 tons of any combination of HAPs as a rolling, 12-month summation facility-wide
 - (b) the probable cause of each deviation (excursion);
 - (c) any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - (d) the magnitude and duration of each deviation (excursion).

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

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

- (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) 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.

e) Testing Requirements:

- (1) Compliance with the Emissions Limitations specified in section 2.a) of these terms and conditions shall be determined in accordance with the following methods:
 - (a) Emission Limitation:
60 tons of VOC per year facility-wide.

Applicable compliance method:

Compliance shall be demonstrated through monitoring and record keeping requirements of B.2.c)(1) of this permit.
 - (b) Emission Limitation:

39.6 tons of PE per year from all stacks facility-wide.



Applicable compliance method:

Compliance shall be demonstrated through monitoring and record keeping requirements of B.2.c)(2) of this permit.

(c) Emission Limitation:

8 tons of individual HAP per year facility-wide.

Applicable compliance method:

Compliance shall be demonstrated through monitoring and record keeping requirements of B.2.c)(3) of this permit.

(d) Emission Limitation:

20 tons of combined HAPs per year facility-wide.

Applicable compliance method:

Compliance shall be demonstrated through monitoring and record keeping requirements of B.2.c)(3) of this permit.

3. The Ohio EPA has determined that this facility is subject to the requirements of 40 CFR Part 63 Subpart BBBB, National Emission Standards for Hazardous Air Pollutants for Area Sources: Chemical Preparations Industry. The following emissions units are affected sources: P002, P005, P010, P011, P018, P019, P021, P022, P023. Although Ohio EPA has determined that this area source MACT (also known as the GACT) applies, at this time Ohio EPA does not have the authority to enforce this standard. Instead, U.S. EPA has the authority to enforce this standard. Please be advised, that all requirements associated with this rule are in effect and shall be enforced by U.S. EPA. For more information on the area source rules, please refer to the following U.S. EPA website: <http://www.epa.gov/ttn/atw/area/arearules.html>.



Final Permit-to-Install and Operate
HA INTERNATIONAL LLC
Permit Number: P0119647
Facility ID: 0448011215
Effective Date: 1/25/2016

C. Emissions Unit Terms and Conditions

1. P002

Operations, Property and/or Equipment Description:

No. 8 solvent paste machine

- 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)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)	Particulate emissions (PE) from the stack serving this emissions unit shall not exceed 0.8 pound per hour and 3.5 tons per year
		Fugitive particulate emissions (PE) shall not exceed 3.5 pounds per hour and 15.3 tons per year
		Volatile organic compounds (VOC) emissions shall not exceed 56 pounds per hour
		See b)(2)a. through b)(2)c.
b.	OAC rule 3745-31-05(D)	See B.2.a)(1)
c.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions (VE) from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-17-07(B)(1)	VE of fugitive dust from this emissions unit shall not exceed twenty percent opacity as a three-minute average.
e.	OAC rule 3745-17-08(B), (B)(3)	See b)(2)d.

(2) Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1) and OAC rule 3745-17-07(B)(1).
- b. The hourly and annual particulate emission limitations were established to reflect the controlled potential to emit for this emissions unit. In accordance with the permit application, the permittee has committed to use a dry filtration system with a minimum of 95% capture and 99% control efficiency whenever the emissions unit is in operation for the purpose of ensuring compliance with the particulate emissions limitations. Therefore, it is not necessary to develop additional recordkeeping and/or reporting requirements to ensure compliance with these limitations beyond the usage of a dry filtration system.
- c. The hourly and annual PE and VOC emission limitations were established to reflect the potential to emit for this emissions unit based on the worst case production data provided in the permittee's application. In accordance with the permit application, the permittee has committed to the following:
 - i. maximum dry addition rate of 7,000 pounds per hour for calculating the particulate emissions;
 - ii. maximum solvent addition rate of 1,650 pounds per hour where the vapor pressure of the VOC-containing liquid organic material is greater than 1.9 kPa for calculating the volatile organic compound emissions; and
 - iii. maximum solvent addition rate of 7,000 pounds per hour where the vapor pressure of the VOC-containing liquid organic material is less than or equal to 1.9 kPa for calculating the volatile organic compound emissions.
- d. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08(B).

c) Operational Restrictions

- (1) The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

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 permit evaluation report the following information concerning the operations of the dry filtration system during the 12-month reporting period for this/these emissions unit(s):

- a. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the dry filtration system.

- (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.

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:

0.8 pound of PE per hour from the stack.

Applicable Compliance Method:

This emissions limitation was established to reflect the controlled potential to emit for this emissions unit based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors,

Table 6.4-1, dated 1/95, as follows: multiply the emission factor of 20 pounds of PE emissions per ton by the maximum hourly rate of dry material addition (7,000 pounds per hour) by the capture efficiency (0.95), and one minus the control efficiency (1-0.99) and divide the result by 2000 pounds per ton.

If required, compliance shall be demonstrated through stack testing performed in accordance with OAC rule 3745-17-03(B)(10) using the methods and procedures of Method 5 of 40 CFR Part 60 Appendix A.

b. Emission limitation:

3.5 tons of PE per year from the stack.

Applicable Compliance Method:

This emission limitation was established to reflect the controlled potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the short term emission rate of 0.8 pound of PE per hour by 8,760 hours per year and divide by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

c. Emission limitation:

3.5 pounds of fugitive PE per hour.

Applicable Compliance Method:

This emissions limitation was established to reflect the potential to emit for this emissions unit based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 6.4-1, dated 1/95, as follows: multiply the emission factor of 20 pounds of PE emissions per ton by the maximum hourly rate of dry material addition (7,000 pounds per hour) by one minus the capture efficiency (1 - 0.95) and divide the result by 2000 pounds per ton.

d. Emission limitation:

15.3 tons of fugitive PE per year.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the short term emission rate of 3.5 pounds of fugitive PE per hour by 8,760 hours per year and divide by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.



e. Emission limitation:

56 pounds of VOC per hour.

Applicable Compliance Method:

This emissions limitation was established to reflect the potential to emit for this emissions unit based on the worst-case operating scenario, as follows:

The emission factor specified in STAAPA/ALAPCO/USEPA reference document Methods for Estimating Air Emissions from Paint, Ink and Other Coating Manufacturing Facilities, page 8.5-4, dated February 2005, as follows: multiply the emission factor (worst-case 0.034 pounds of VOC emissions per pound of solvent) by the maximum hourly rate of VOC-containing liquid organic material addition (1,650 pounds).

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 18, 25 or 25A, as appropriate, of 40 CFR Part 60 Appendix A. Use of Method 18, 25 or 25A is to be selected based on the results of pre-survey stack sampling and U.S. EPA guidance documents. Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA.

f. Emission limitation:

Visible particulate emissions from the stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

g. Emission limitation:

Visible emissions of fugitive dust shall not exceed 20 percent opacity as a three-minute average.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible emissions readings performed in accordance with OAC rule 3745-17-03(B)(3) using the methods and procedures of Method 9 of 40 CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

g) Miscellaneous Requirements

(1) None.

2. P005

Operations, Property and/or Equipment Description:

Nos. 10/11 solvent cowles mixer

- 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)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)	Particulate emissions (PE) from the stack serving this emissions unit shall not exceed 1.3 pounds per hour and 5.7 tons per year. Fugitive PE shall not exceed 5.6 pounds per hour and 24.5 tons per year. Volatile organic compound emissions (VOC) shall not exceed 79 pounds per hour. See b)(2)a. through b)(2)c.
b.	OAC rule 3745-31-05(D)	See B.2.a)(1)
c.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions (VE) from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
d.	OAC rule 3745-17-07(B)(1)	VE of fugitive dust from this emissions unit shall not exceed twenty percent opacity as a three-minute average.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	OAC rule 3745-17-08(B), (B)(3)	See b)(2)d.

(2) Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1) and OAC rule 3745-17-07(B)(1).
- b. The hourly and annual particulate emission limitations were established to reflect the controlled potential to emit for this emissions unit. In accordance with the permit application, the permittee has committed to use a dry filtration system with a minimum of 95% capture and 99% control efficiency whenever the emissions unit is in operation for the purpose of ensuring compliance with the particulate emissions limitations. Therefore, it is not necessary to develop additional recordkeeping and/or reporting requirements to ensure compliance with these limitations beyond the usage of a dry filtration system.
- c. The hourly and annual PE and VOC emission limitations were established to reflect the potential to emit for this emissions unit based on the worst case production data provided in the permittee's application. In accordance with the permit application, the permittee has committed to the following:
 - i. maximum dry addition rate of 11,200 pounds per hour for calculating the particulate emissions;
 - ii. maximum solvent addition rate of 2,325 pounds per hour where the vapor pressure of the VOC-containing liquid organic material is greater than 1.9 kPa for calculating the volatile organic compound emissions; and
 - iii. maximum solvent addition rate of 8,370 pounds per hour where the vapor pressure of the VOC-containing liquid organic material is less than or equal to 1.9 kPa for calculating the volatile organic compound emissions.
- d. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08(B).

c) Operational Restrictions

- (1) The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

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 permit evaluation report the following information concerning the operations of the dry filtration system during the 12-month reporting period for this/these emissions unit(s):
 - a. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the dry filtration system.
- (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.

f) Testing Requirements

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

1.3 pounds of PE per hour from the stack.

Applicable Compliance Method:

This emissions limitation was established to reflect the controlled potential to emit for this emissions unit based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 6.4-1, dated 1/95, as follows: multiply the emission factor of 20 pounds of PE emissions per ton by the maximum hourly rate of dry material addition (11,200 pounds per hour) by the capture efficiency (0.95), and by one minus the control efficiency (1-0.99) and divide the result by 2000 pounds per ton.



If required, compliance shall be demonstrated through stack testing performed in accordance with OAC rule 3745-17-03(B)(10) using the methods and procedures of Method 5 of 40 CFR Part 60 Appendix A.

b. Emission limitation:

5.7 tons of PE per year from the stack.

Applicable Compliance Method:

This emission limitation was established to reflect the controlled potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the short term emission rate of 1.3 pounds of PE per hour by 8,760 hours per year and divide by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

c. Emission limitation:

5.6 pounds of fugitive PE per hour.

Applicable Compliance Method:

This emissions limitation was established to reflect the potential to emit for this emissions unit based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 6.4-1, dated 1/95, as follows: multiply the emission factor of 20 pounds of PE emissions per ton by the maximum hourly rate of dry material addition (11,200 pounds per hour) by one minus the capture efficiency (1 - 0.95) and divide the result by 2000 pounds per ton.

d. Emission limitation:

24.5 tons of fugitive PE per year.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the short term emission rate of 5.6 pounds of fugitive PE per hour by 8,760 hours per year and divide by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

e. Emission limitation:

79 pounds of VOC per hour.



Applicable Compliance Method:

This emissions limitation was established to reflect the potential to emit for this emissions unit based on the worst-case operating scenario, as follows:

The emission factor specified in STAAPA/ALAPCO/USEPA reference document Methods for Estimating Air Emissions from Paint, Ink and Other Coating Manufacturing Facilities, page 8.5-4, dated February 2005, as follows: multiply the emission factor (worst-case 0.034 pounds of VOC emissions per pound of solvent) by the maximum hourly rate of VOC-containing liquid organic material addition (2,325 pounds).

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 18, 25 or 25A, as appropriate, of 40 CFR Part 60 Appendix A. Use of Method 18, 25 or 25A is to be selected based on the results of pre-survey stack sampling and U.S. EPA guidance documents. Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA.

f. Emission limitation:

Visible particulate emissions from the stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

g. Emission limitation:

Visible emissions of fugitive dust shall not exceed 20 percent opacity as a three-minute average.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible emissions readings performed in accordance with OAC rule 3745-17-03(B)(3) using the methods and procedures of Method 9 of 40 CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

g) Miscellaneous Requirements

- (1) None.

3. P010

Operations, Property and/or Equipment Description:

No. 2 paste machine

- 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)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)	Particulate emissions (PE) from the stack serving this emissions unit shall not exceed 0.7 pound per hour and 3.1 tons per year
		Fugitive PE shall not exceed 3.1 pounds per hour and 13.6 tons per year
		Volatile organic compound emissions (VOC) shall not exceed 30 pounds per hour
		See b)(2)a. through b)(2)c.
b.	OAC rule 3745-31-05(D)	See B.2.a)(1)
c.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions (VE) from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
d.	OAC rule 3745-17-07(B)(1)	VE of fugitive dust from this emissions unit shall not exceed twenty percent opacity as a three-minute average.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	OAC rule 3745-17-08(B), (B)(3)	See b)(2)d.

(2) Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1) and OAC rule 3745-17-07(B)(1).
- b. The hourly and annual particulate emission limitations were established to reflect the controlled potential to emit for this emissions unit. In accordance with the permit application, the permittee has committed to use a dry filtration system with a minimum of 95% capture and 99% control efficiency whenever the emissions unit is in operation for the purpose of ensuring compliance with the particulate emissions limitations. Therefore, it is not necessary to develop additional recordkeeping and/or reporting requirements to ensure compliance with these limitations beyond the usage of a dry filtration system.
- c. The hourly and annual PE and VOC emission limitations were established to reflect the potential to emit for this emissions unit based on the worst case production data provided in the permittee's application. In accordance with the permit application, the permittee has committed to the following:
 - i. maximum dry addition rate of 6,000 pounds per hour for calculating the particulate emissions;
 - ii. maximum solvent addition rate of 206 pounds per hour where the vapor pressure of the VOC-containing liquid organic material is greater than 1.9 kPa for calculating the volatile organic compound emissions; and
 - iii. maximum solvent addition rate of 6,000 pounds per hour where the vapor pressure of the VOC-containing liquid organic material is less than or equal to 1.9 kPa for calculating the volatile organic compound emissions.
- d. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08(B).

c) Operational Restrictions

- (1) The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

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 permit evaluation report the following information concerning the operations of the dry filtration system during the 12-month reporting period for this/these emissions unit(s):
 - a. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the dry filtration system.
- (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.

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:

0.7 pound of PE per hour from the stack.

Applicable compliance method:

This emissions limitation was established to reflect the controlled potential to emit for this emissions unit based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 6.4-1, dated 1/95, as follows: multiply the emission factor of 20 pounds of PE emissions per ton by the maximum hourly rate of dry material addition (6,000 pounds per hour) by the capture efficiency (0.95), and one minus the control efficiency (1-0.99) and divide the result by 2000 pounds per ton.

If required, compliance shall be demonstrated through stack testing performed in accordance with OAC rule 3745-17-03(B)(10) using the methods and procedures of Method 5 of 40 CFR Part 60 Appendix A.

b. Emission limitation:

3.1 tons of PE per year from the stack.

Applicable compliance method:

This emission limitation was established to reflect the controlled potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the short term emission rate of 0.7 pound of PE per hour by 8,760 hours per year and divide by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

c. Emission limitation:

3.1 pounds of fugitive PE per hour.

Applicable compliance method:

This emissions limitation was established to reflect the potential to emit for this emissions unit based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 6.4-1, dated 1/95, as follows: multiply the emission factor of 20 pounds of PE emissions per ton by the maximum hourly rate of dry material addition (6,000 pounds per hour) by one minus the capture efficiency (1 - 0.95) and divide the result by 2000 pounds per ton.

d. Emission limitation:

13.6 tons of fugitive PE per year.

Applicable compliance method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the short term emission rate of 3.1 pounds of fugitive PE per hour by 8,760 hours per year and divide by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

e. Emission limitation:

30 pounds of VOC per hour.



Applicable compliance method:

This emissions limitation was established to reflect the potential to emit for this emissions unit based on the worst-case operating scenario, as follows:

The emission factor derived from a mass balance study performed at the facility on November 8, 2011 for liquid organic material with a vapor pressure less than or equal to 1.9 kPa being mixed with the powdered ingredients (0.005 pound VOC per pound solvent used), as follows: multiply the emission factor in pounds of VOC emissions per pound of solvent (worst-case 0.005 pound of VOC emissions per pound of solvent) by the maximum hourly rate of VOC-containing liquid organic material addition (worst-case 6,000 pounds).

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 18, 25 or 25A, as appropriate, of 40 CFR Part 60 Appendix A. Use of Method 18, 25 or 25A is to be selected based on the results of pre-survey stack sampling and U.S. EPA guidance documents. Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA.

f. Emission limitation:

Visible particulate emissions from the stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable compliance method:

If required, compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

g. Emission limitation:

Visible emissions of fugitive dust shall not exceed 20 percent opacity as a three-minute average.

Applicable compliance method:

If required, compliance shall be demonstrated through visible emissions readings performed in accordance with OAC rule 3745-17-03(B)(3) using the methods and procedures of Method 9 of 40 CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

g) Miscellaneous Requirements

(1) None.

4. P011

Operations, Property and/or Equipment Description:

No. 21 solvent drum mixer

- 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)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)	Particulate emissions (PE) from the stack serving this emissions unit shall not exceed 0.2 pound per hour and 0.9 ton per year. Fugitive PE shall not exceed 0.8 pound per hour and 3.5 tons per year Volatile organic compound (VOC) emissions shall not exceed 13.6 pounds per hour and 59.6 tons per year See b)(2)a. through b)(2)c.
b.	OAC rule 3745-31-05(D)	See B.2.a)(1)
c.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions (VE) from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
d.	OAC rule 3745-17-07(B)(1)	VE of fugitive dust shall not exceed twenty percent opacity as a three-minute average.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	OAC rule 3745-17-08(B), (B)(3)	See b)(2)d.

(2) Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1) and OAC rule 3745-17-07(B)(1).
- b. The hourly and annual particulate emission limitations were established to reflect the controlled potential to emit for this emissions unit. In accordance with the permit application, the permittee has committed to use a dry filtration system with a minimum of 95% capture and 99% control efficiency whenever the emissions unit is in operation for the purpose of ensuring compliance with the particulate emissions limitations. Therefore, it is not necessary to develop additional recordkeeping and/or reporting requirements to ensure compliance with these limitations beyond the usage of a dry filtration system.
- c. The hourly and annual PE and VOC emission limitations were established to reflect the potential to emit for this emissions unit based on the worst case production data provided in the permittee's application. In accordance with the permit application, the permittee has committed to the following:
 - i. maximum dry addition rate of 1,600 pounds per hour for calculating the particulate emissions;
 - ii. maximum solvent addition rate of 400 pounds per hour where the vapor pressure of the VOC-containing liquid organic material is greater than 1.9 kPa for calculating the volatile organic compound emissions; and
 - iii. maximum solvent addition rate of 1,600 pounds per hour where the vapor pressure of the VOC-containing liquid organic material is less than or equal to 1.9 kPa for calculating the volatile organic compound emissions.
- d. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08(B).

c) Operational Restrictions

- (1) The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

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 permit evaluation report the following information concerning the operations of the dry filtration system during the 12-month reporting period for this/these emissions unit(s):
 - a. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the dry filtration system.
- (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.

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:

0.2 pound of PE per hour from the stack.

Applicable compliance method:

This emissions limitation was established to reflect the controlled potential to emit for this emissions unit based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 6.4-1, dated 1/95, as follows: multiply the emission factor of 20 pounds of PE emissions per ton by the maximum hourly rate of dry material addition (1,600 pounds per hour) by the capture efficiency (0.95), and one minus the control efficiency (1-0.99) and divide the result by 2000 pounds per ton.

If required, compliance shall be demonstrated through stack testing performed in accordance with OAC rule 3745-17-03(B)(10) using the methods and procedures of Method 5 of 40 CFR Part 60 Appendix A.

b. Emission limitation:

0.9 ton of PE per year from the stack.

Applicable compliance method:

This emission limitation was established to reflect the controlled potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the short term emission rate of 0.2 pound of PE per hour by 8,760 hours per year and divide by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

c. Emission limitation:

0.8 pound of fugitive PE per hour.

Applicable compliance method:

This emissions limitation was established to reflect the potential to emit for this emissions unit based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 6.4-1, dated 1/95, as follows: multiply the emission factor of 20 pounds of PE emissions per ton by the maximum hourly rate of dry material addition (1,600 pounds per hour) by one minus the capture efficiency (1 - 0.95) and divide the result by 2000 pounds per ton.

d. Emission limitation:

3.5 tons of fugitive PE per year.

Applicable compliance method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the short term emission rate of 0.8 pound of fugitive PE per hour by 8,760 hours per year and divide by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

e. Emission limitation:

13.6 pounds of VOC per hour.



Applicable compliance method:

This emissions limitation was established to reflect the potential to emit for this emissions unit based on the worst-case operating scenario, as follows:

The emission factor specified in STAAPA/ALAPCO/USEPA reference document Methods for Estimating Air Emissions from Paint, Ink and Other Coating Manufacturing Facilities, page 8.5-4, dated February 2005, as follows: multiply the emission factor in pounds of VOC emissions per pound of solvent (worst-case 0.034 pounds of VOC emissions per pound of solvent) by the maximum hourly rate of VOC-containing liquid organic material addition (400 pounds).

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 18, 25 or 25A, as appropriate, of 40 CFR Part 60 Appendix A. Use of Method 18, 25 or 25A is to be selected based on the results of pre-survey stack sampling and U.S. EPA guidance documents. Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA.

f. Emission limitation:

Visible particulate emissions from the stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable compliance method:

If required, compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

g. Emission limitation:

Visible emissions of fugitive dust shall not exceed 20 percent opacity as a three-minute average.

Applicable compliance method:

If required, compliance shall be demonstrated through visible emissions readings performed in accordance with OAC rule 3745-17-03(B)(3) using the methods and procedures of Method 9 of 40 CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

g) Miscellaneous Requirements

(1) None.

5. P018

Operations, Property and/or Equipment Description:

No. 5 paste (water-based)

- 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)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)	Particulate emissions (PE) from the stack serving this emissions unit shall not exceed 1.0 pound per hour and 4.4 tons per year Fugitive PE shall not exceed 4.5 pounds per hour and 19.7 tons per year Volatile organic compound (VOC) emissions shall not exceed 30 pounds per hour See b)(2)a. through b)(2)c.
b.	OAC rule 3745-31-05(D)	See B.2.a)(1)
c.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions (VE) from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
d.	OAC rule 3745-17-07(B)(1)	VE of fugitive dust shall not exceed twenty percent opacity as a three-minute average.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	OAC rule 3745-17-08(B), (B)(3)	See b)(2)d.

(2) Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1) and OAC rule 3745-17-07(B)(1).
- b. The hourly and annual particulate emission limitations were established to reflect the controlled potential to emit for this emissions unit. In accordance with the permit application, the permittee has committed to use a dry filtration system with a minimum of 95% capture and 99% control efficiency whenever the emissions unit is in operation for the purpose of ensuring compliance with the particulate emissions limitations. Therefore, it is not necessary to develop additional recordkeeping and/or reporting requirements to ensure compliance with these limitations beyond the usage of a dry filtration system.
- c. The hourly and annual PE and VOC emission limitations were established to reflect the potential to emit for this emissions unit based on the worst case production data provided in the permittee's application. In accordance with the permit application, the permittee has committed to the following:
 - i. maximum dry addition rate of 9,000 pounds per hour for calculating the particulate emissions;
 - ii. maximum solvent addition rate of 300 pounds per hour where the vapor pressure of the VOC-containing liquid organic material is greater than 1.9 kPa for calculating the volatile organic compound emissions; and
 - iii. maximum solvent addition rate of 6,000 pounds per hour where the vapor pressure of the VOC-containing liquid organic material is less than or equal to 1.9 kPa for calculating the volatile organic compound emissions.
- d. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08(B).

c) Operational Restrictions

- (1) The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

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 permit evaluation report the following information concerning the operations of the dry filtration system during the 12-month reporting period for this/these emissions unit(s):
 - a. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the dry filtration system.
- (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.

f) Testing Requirements

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

1.0 pound of PE per hour from the stack.

Applicable compliance method:

This emissions limitation was established to reflect the controlled potential to emit for this emissions unit based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 6.4-1, dated 1/95, as follows: multiply the emission factor of 20 pounds of PE emissions per ton by the maximum hourly rate of dry material addition (9,000 pounds per hour) by the capture efficiency (0.95), and one minus the control efficiency (1-0.99) and divide the result by 2000 pounds per ton.

If required, compliance shall be demonstrated through stack testing performed in accordance with OAC rule 3745-17-03(B)(10) using the methods and procedures of Method 5 of 40 CFR Part 60 Appendix A.

b. Emission limitation:

4.4 tons of PE per year from the stack.

Applicable compliance method:

This emission limitation was established to reflect the controlled potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the short term emission rate of 1.0 pound of PE per hour by 8,760 hours per year and divide by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

c. Emission limitation:

4.5 pounds of fugitive PE per hour.

Applicable compliance method:

This emissions limitation was established to reflect the potential to emit for this emissions unit based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 6.4-1, dated 1/95, as follows: multiply the emission factor of 20 pounds of PE emissions per ton by the maximum hourly rate of dry material addition (9,000 pounds per hour) by one minus the capture efficiency (1 - 0.95) and divide the result by 2000 pounds per ton.

d. Emission limitation:

19.7 tons of fugitive PE per year.

Applicable compliance method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the short term emission rate of 4.5 pounds of fugitive PE per hour by 8,760 hours per year and divide by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

e. Emission limitation:

30 pounds of VOC per hour



Applicable compliance method:

This emissions limitation was established to reflect the potential to emit for this emissions unit based on the worst-case operating scenario, as follows:

The emission factor derived from a mass balance study performed at the facility on November 8, 2011 for liquid organic material with a vapor pressure less than or equal to 1.9 kPa being mixed with the powdered ingredients (0.005 pound VOC per pound solvent used), as follows: multiply the emission factor in pounds of VOC emissions per pound of solvent (worst-case 0.005 pound VOC per pound solvent used) by the maximum hourly rate of VOC-containing liquid organic material addition (6,000 pounds).

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 18, 25 or 25A, as appropriate, of 40 CFR Part 60 Appendix A. Use of Method 18, 25 or 25A is to be selected based on the results of pre-survey stack sampling and U.S. EPA guidance documents. Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA.

f. Emission limitation:

Visible particulate emissions from the stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable compliance method:

If required, compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

g. Emission limitation:

Visible emissions of fugitive dust shall not exceed 20 percent opacity as a three-minute average.

Applicable compliance method:

If required, compliance shall be demonstrated through visible emissions readings performed in accordance with OAC rule 3745-17-03(B)(3) using the methods and procedures of Method 9 of 40 CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

g) Miscellaneous Requirements

(1) None.

6. P019

Operations, Property and/or Equipment Description:

No. 9 let down station

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)(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)	Volatile organic compound emissions (VOC) shall not exceed 112 pounds per hour See b)(2)a.
b.	OAC rule 3745-31-05(D)	See B.2.a)(1)

(2) Additional Terms and Conditions

a. The hourly and annual VOC emission limitations were established to reflect the potential to emit for this emissions unit based on the worst case production data provided in the permittee's application. In accordance with the permit application, the permittee has committed to the following:

- i. maximum dry addition rate of 0 pounds per hour for calculating the particulate emissions;
- ii. maximum solvent addition rate of 3,300 pounds per hour where the vapor pressure of the VOC-containing liquid organic material is greater than 1.9 kPa for calculating the volatile organic compound emissions; and

- iii. maximum solvent addition rate of 0 pounds per hour where the vapor pressure of the VOC-containing liquid organic material is less than or equal to 1.9 kPa for calculating the volatile organic compound emissions.
- c) Operational Restrictions
 - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) None.
- 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.
- 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:
112 pounds of VOC per hour.

Applicable compliance method:

This emissions limitation was established to reflect the potential to emit for this emissions unit based on the worst-case operating scenario, as follows:



Final Permit-to-Install and Operate
HA INTERNATIONAL LLC
Permit Number: P0119647
Facility ID: 0448011215
Effective Date: 1/25/2016

The emission factor specified in STAAPA/ALAPCO/USEPA reference document Methods for Estimating Air Emissions from Paint, Ink and Other Coating Manufacturing Facilities, page 8.5-4, dated February 2005, as follows: multiply the emission factor in pounds of VOC emissions per pound of solvent (worst-case 0.034 pounds of VOC emissions per pound of solvent) by the maximum hourly rate of VOC-containing liquid organic material addition (3,300 pounds).

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 18, 25 or 25A, as appropriate, of 40 CFR Part 60 Appendix A. Use of Method 18, 25 or 25A is to be selected based on the results of pre-survey stack sampling and U.S. EPA guidance documents. Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA.

- g) Miscellaneous Requirements
 - (1) None.

7. P021

Operations, Property and/or Equipment Description:

Nos. 23, 24, 25 Toledo Shar

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)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)	Particulate emissions (PE) from the stack serving this emissions unit shall not exceed 1.5 pounds per hour and 6.6 tons per year Fugitive PE shall not exceed 6.5 pounds per hour and 28.5 tons per year Volatile organic compound (VOC) emissions shall not exceed 65 pounds per hour See b)(2)a. through b)(2)c.
b.	OAC rule 3745-31-05(D)	See B.2.a)(1)
c.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions (VE) from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
d.	OAC rule 3745-17-07(B)(1)	VE of fugitive dust shall not exceed twenty percent opacity as a three-minute average.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	OAC rule 3745-17-08(B), (B)(3)	See b)(2)d.

(2) Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1) and OAC rule 3745-17-07(B)(1).
- b. The hourly and annual particulate emission limitations were established to reflect the controlled potential to emit for this emissions unit. In accordance with the permit application, the permittee has committed to use a dry filtration system with a minimum of 95% capture and 99% control efficiency whenever the emissions unit is in operation for the purpose of ensuring compliance with the particulate emissions limitations. Therefore, it is not necessary to develop additional recordkeeping and/or reporting requirements to ensure compliance with these limitations beyond the usage of a dry filtration system.
- c. The hourly and annual PE and VOC emission limitations were established to reflect the potential to emit for this emissions unit based on the worst case production data provided in the permittee's application. In accordance with the permit application, the permittee has committed to the following:
 - i. maximum dry addition rate of 13,000 pounds per hour for calculating the particulate emissions;
 - ii. maximum solvent addition rate of 150 pounds per hour where the vapor pressure of the VOC-containing liquid organic material is greater than 1.9 kPa for calculating the volatile organic compound emissions; and
 - iii. maximum solvent addition rate of 13,000 pounds per hour where the vapor pressure of the VOC-containing liquid organic material is less than or equal to 1.9 kPa for calculating the volatile organic compound emissions.
- d. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08(B).

c) Operational Restrictions

- (1) The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

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 permit evaluation report the following information concerning the operations of the dry filtration system during the 12-month reporting period for this/these emissions unit(s):
 - a. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the dry filtration system.
- (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.

f) Testing Requirements

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

1.5 pounds of PE per hour from the stack.

Applicable compliance method:

This emissions limitation was established to reflect the controlled potential to emit for this emissions unit based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 6.4-1, dated 1/95, as follows: multiply the emission factor of 20 pounds of PE emissions per ton by the maximum hourly rate of dry material addition (13,000 pounds per hour) by the capture efficiency (0.95), and one minus the control efficiency (1-0.99) and divide the result by 2000 pounds per ton.

If required, compliance shall be demonstrated through stack testing performed in accordance with OAC rule 3745-17-03(B)(10) using the methods and procedures of Method 5 of 40 CFR Part 60 Appendix A.

b. Emission limitation:

6.6 tons of PE per year from the stack.

Applicable compliance method:

This emission limitation was established to reflect the controlled potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the short term emission rate of 1.5 pounds of PE per hour by 8,760 hours per year and divide by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

c. Emission limitation:

6.5 pounds of fugitive PE per hour

Applicable compliance method:

This emissions limitation was established to reflect the potential to emit for this emissions unit based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 6.4-1, dated 1/95, as follows: multiply the emission factor of 20 pounds of PE emissions per ton by the maximum hourly rate of dry material addition (13,000 pounds per hour) by one minus the capture efficiency (1 - 0.95) and divide the result by 2000 pounds per ton.

d. Emission limitation:

28.5 tons of fugitive PE per year.

Applicable compliance method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the short term emission rate of 6.5 pounds of fugitive PE per hour by 8,760 hours per year and divide by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

e. Emission limitation:

65 pounds of VOC per hour.



Applicable compliance method:

This emissions limitation was established to reflect the potential to emit for this emissions unit based on the worst-case operating scenario, as follows:

The emission factor derived from a mass balance study performed at the facility on November 8, 2011 for liquid organic material with a vapor pressure less than or equal to 1.9 kPa being mixed with the powdered ingredients (0.005 pound VOC per pound solvent used), as follows: multiply the emission factor in pounds of VOC emissions per pound of solvent (worst-case 0.005 pound VOC per pound solvent used) by the maximum hourly rate of VOC-containing liquid organic material addition (13,000 pounds).

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 18, 25 or 25A, as appropriate, of 40 CFR Part 60 Appendix A. Use of Method 18, 25 or 25A is to be selected based on the results of pre-survey stack sampling and U.S. EPA guidance documents. Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA.

f. Emission limitation:

Visible particulate emissions from the stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable compliance method:

If required, compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

g. Emission limitation:

Visible emissions of fugitive dust shall not exceed 20 percent opacity as a three-minute average.

Applicable compliance method:

If required, compliance shall be demonstrated through visible emissions readings performed in accordance with OAC rule 3745-17-03(B)(3) using the methods and procedures of Method 9 of 40 CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

g) Miscellaneous Requirements

- (1) None.

8. Emissions Unit Group - P022, P023

EU ID	Operations, Property and/or Equipment Description
P022	No. 30 MilShar 1
P023	No. 31 MilShar 2

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

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

a. None.

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

a. 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)	Particulate emissions (PE) from the stack serving this emissions unit shall not exceed 1.5 pounds per hour and 6.6 tons per year Fugitive PE shall not exceed 6.5 pounds per hour and 28.5 tons per year Volatile organic compound (VOC) emissions shall not exceed 65 pounds per hour See b)(2)a. through b)(2)c.
b.	OAC rule 3745-31-05(D)	See B.2.a)(1)
c.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions (VE) from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-17-07(B)(1)	VE of fugitive dust shall not exceed twenty percent opacity as a three-minute average.
e.	OAC rule 3745-17-08(B), (B)(3)	See b)(2)d.

(2) Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1) and OAC rule 3745-17-07(B)(1).
- b. The hourly and annual particulate emission limitations were established to reflect the controlled potential to emit for this emissions unit. In accordance with the permit application, the permittee has committed to use a dry filtration system with a minimum of 95% capture and 99% control efficiency whenever the emissions unit is in operation for the purpose of ensuring compliance with the particulate emissions limitations. Therefore, it is not necessary to develop additional recordkeeping and/or reporting requirements to ensure compliance with these limitations beyond the usage of a dry filtration system.
- c. The hourly and annual PE and VOC emission limitations were established to reflect the potential to emit for this emissions unit based on the worst case production data provided in the permittee's application. In accordance with the permit application, the permittee has committed to the following:
 - i. maximum dry addition rate of 13,000 pounds per hour for calculating the particulate emissions;
 - ii. maximum solvent addition rate of 180 pounds per hour where the vapor pressure of the VOC-containing liquid organic material is greater than 1.9 kPa for calculating the volatile organic compound emissions; and
 - iii. maximum solvent addition rate of 13,000 pounds per hour where the vapor pressure of the VOC-containing liquid organic material is less than or equal to 1.9 kPa for calculating the volatile organic compound emissions.
- d. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08(B).

c) Operational Restrictions

- (1) The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

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 permit evaluation report the following information concerning the operations of the dry filtration system during the 12-month reporting period for this/these emissions unit(s):

- a. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the dry filtration system.

- (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.

f) Testing Requirements

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

- a. Emission limitation:

1.5 pounds of PE per hour from the stack.

Applicable compliance method:

This emissions limitation was established to reflect the controlled potential to emit for this emissions unit based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors,

Table 6.4-1, dated 1/95, as follows: multiply the emission factor of 20 pounds of PE emissions per ton by the maximum hourly rate of dry material addition (13,000 pounds per hour) by the capture efficiency (0.95), and one minus the control efficiency (1-0.99) and divide the result by 2000 pounds per ton.

If required, compliance shall be demonstrated through stack testing performed in accordance with OAC rule 3745-17-03(B)(10) using the methods and procedures of Method 5 of 40 CFR Part 60 Appendix A.

b. Emission limitation:

6.6 tons of PE per year from the stack.

Applicable compliance method:

This emission limitation was established to reflect the controlled potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the short term emission rate of 1.5 pounds of PE per hour by 8,760 hours per year and divide by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

c. Emission limitation:

6.5 pounds of fugitive PE per hour.

Applicable compliance method:

This emissions limitation was established to reflect the potential to emit for this emissions unit based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 6.4-1, dated 1/95, as follows: multiply the emission factor of 20 pounds of PE emissions per ton by the maximum hourly rate of dry material addition (13,000 pounds per hour) by one minus the capture efficiency (1 - 0.95) and divide the result by 2000 pounds per ton.

d. Emission limitation:

28.5 tons of fugitive PE per year

Applicable compliance method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the short term emission rate of 6.5 pounds of fugitive PE per hour by 8,760 hours per year and divide by 2,000 pounds per ton.

e. Emission limitation:

65 pounds of VOC per hour



Applicable compliance method:

This emissions limitation was established to reflect the potential to emit for this emissions unit based on the worst-case operating scenario, as follows:

The emission factor derived from a mass balance study performed at the facility on November 8, 2011 for liquid organic material with a vapor pressure less than or equal to 1.9 kPa being mixed with the powdered ingredients (0.005 pound VOC per pound solvent used), as follows: multiply the emission factor in pounds of VOC emissions per pound of solvent (worst-case 0.005 pound VOC per pound solvent used) by the maximum hourly rate of VOC-containing liquid organic material addition (13,000 pounds).

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 18, 25 or 25A, as appropriate, of 40 CFR Part 60 Appendix A. Use of Method 18, 25 or 25A is to be selected based on the results of pre-survey stack sampling and U.S. EPA guidance documents. Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA.

f. Emission limitation:

Visible particulate emissions from the stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable compliance method:

If required, compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

g. Emission limitation:

Visible emissions of fugitive dust shall not exceed 20 percent opacity as a three-minute average.

Applicable compliance method:

If required, compliance shall be demonstrated through visible emissions readings performed in accordance with OAC rule 3745-17-03(B)(3) using the methods and procedures of Method 9 of 40 CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

g) Miscellaneous Requirements

(1) None.

9. P025

Operations, Property and/or Equipment Description:

Organic Liquid Repackaging Operation

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - a. b)(1)b., b)(1)d., b)(1)e., and d)(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	Volatile organic compounds (VOC) emissions shall not exceed 5.5 pounds per hour. See b)(2)a. and b)(2)b.
b.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)c.
c.	OAC rule 3745-31-05(D)	See B.2.a)(1)
d.	OAC rule 3745-31-05(E)	VOC emissions from this emissions unit shall not exceed 1.1 tons as a rolling, 12-month summation.
e.	ORC 3704.03(F)(3)(c) and F(4)	See d)(2)

- (2) Additional Terms and Conditions
 - a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code

(ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

- b. The hourly emission limitation was established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop recordkeeping and/or reporting requirements to ensure compliance with this limitation.
- 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 Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the potential to emit for VOC is less than 10 tons/year.

c) Operational Restrictions

- (1) The maximum annual amount of material transferred shall not exceed 200,000 pounds, based upon a rolling, 12-month summation of the throughput rates.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information:
 - a. the material transfer rate for each month, in pounds; and
 - b. the rolling, 12-month summation of the material transfer rates, in pounds per year.
- (2) 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 federally enforceable permit to install and operate (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.

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 permit evaluation report the following information concerning the operations of the baghouse during the 12-month reporting period for this/these emissions unit(s):
 - a. any exceedance of the maximum allowable cumulative material transfer rate
- (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.

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:

5.5 pounds of VOC per hour

Applicable compliance method:

This emission limitation was established to reflect the potential to emit for this emissions unit through calculations based on one-third of the emission factor specified in the STAAPA/ALAPCO/USEPA reference document Methods for Estimating Air Emissions from Paint, Ink and Other Coating Manufacturing Facilities, page 8.5-4, dated February 2005, as follows: multiply the emission factor in pounds of VOC emissions per pound of material transferred (0.011 pound VOC per pound solvent transferred) by the maximum rate of material transferred (500 pounds of material transferred per hour).

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 18, 25 or 25A, as appropriate, of 40 CFR Part 60 Appendix A. Use of Method 18, 25 or 25A is to be selected based on the results of pre-survey stack sampling and U.S. EPA guidance documents. Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA.



b. Emission limitation:

1.1 tons of VOC as a rolling, 12-month summation

Applicable compliance method:

This emission limitation was established by calculations based on the worst case operating scenario, as follows: multiply the maximum annual rate of material transfer (200,000 pounds per year) by one-third of the emission factor specified in the STAAPA/ALAPCO/USEPA reference document Methods for Estimating Air Emissions from Paint, Ink and Other Coating Manufacturing Facilities, page 8.5-4, dated February 2005 (0.011 pound of VOC per pound of organic material transferred) and dividing by 2,000 pounds/ton.

If required, the permittee shall establish a site specific emission factor based on EPA approved test procedures.

g) Miscellaneous Requirements

(1) None.

10. P028, Fill Station 1

Operations, Property and/or Equipment Description:

Supersack Filling Station

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - a. b)(1)b. and b)(1)d.
 - (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) June 30, 2008	Install a particulate control filter with a design efficiency of at least 99.5% control of particulate matter. See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	See b)(2)b. and b)(2)c.
c.	OAC rule 3745-31-05(D)	See B.2.a)(1)
d.	OAC rule 3745-31-05(E)	Particulate matter less than or equal to 10 microns in diameter (PM ₁₀) from stack emissions shall not exceed 0.5 ton per year. Employ a particulate control filter with a design efficiency of at least 99.5% control of particulate matter.
e.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity as a 6-minute average unless otherwise specified by the rule.
f.	OAC rule 3745-17-11(B)(1)	PE shall not exceed 4.3 pounds per hour.

- (2) Additional Terms and Conditions
 - a. This Best Available Technology (BAT) emission limit applies for PM₁₀ emissions until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).
 - b. These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.
 - c. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the PM₁₀ emissions from this air contaminant source since the calculated annual emission rate for PM₁₀ is less than ten tons per year, taking into account the voluntary restriction from OAC rule 3745-31-05(E).
- c) Operational Restrictions
 - (1) The permittee shall employ a particulate filter whenever this emissions unit is in operation.
 - (2) The permittee shall install and operate a dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.
 - (3) In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. The 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 operations;
 - d. The total duration of any visible emission incident; and
 - e. Any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

- (2) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
- (3) The permittee shall conduct periodic inspections of the particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.
- (4) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (5) The permittee shall document each inspection (periodic and annual) of the particulate filter system and shall maintain the following information:
 - a. the date of the inspection;
 - b. a description of each/any problem identified and the date it was corrected;
 - c. a description of any maintenance and repairs performed; and
 - d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

- (6) The permittee shall maintain records that document any time periods when the particulate filter was not in service when the emissions unit was in operation, as well as, a record of all operations during which the particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA District Office or local air agency upon request.

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 the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(1) above:
- a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
 - b. any corrective actions taken to minimize or eliminate the visible particulate emissions.
- (3) The permittee shall identify the following information in the annual permit evaluation report:
- 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. employing a particulate filter whenever the emissions unit is in operation;
 - ii. operating the particulate filter according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit is in operation;
 - iii. performing periodic inspections of the particulate filter at a frequency that shall be based upon the recommendation of the manufacturer instructions or operating manuals with any documented modifications deemed necessary by the permittee or operator; and
 - iv. conducting an annual comprehensive inspection of the particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
 - 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 since the last annual permit evaluation report or the date of permit issuance, the permittee shall submit a report that states that no deviations (excursions) occurred.

- (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.

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:**

20% opacity as a 6-minute average

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A, using methods and procedures specified in OAC rule 3745-17-03(B)(1); or other U.S. EPA approved test method, with prior approval from the Ohio EPA.
 - b. **Emission Limitation:**

PE shall not exceed 4.3 pounds per hour.



Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 5 of 40 CFR Part 60 Appendix A, or other U.S. EPA-approved test method, with prior approval from the Ohio EPA.

c. Emission Limitation:

PM₁₀ shall not exceed 0.5 ton per year.

Applicable Compliance Method:

This is based on a one-time calculation of the maximum hourly emission limitation of 0.11 pound of PM₁₀ per hour multiplied by 8760 hours per year and divided by 2000 pounds per ton.

If required, the permittee shall demonstrate compliance with the maximum hourly emissions limitation in accordance with Methods 201 and 202 of 40 CFR Part 51, Appendix M, or other U.S. EPA-approved test method, with prior approval from the Ohio EPA.

g) Miscellaneous Requirements

- (1) None.