State of Ohio Environmental Protection Agency

RE: FINAL PERMIT TO INSTALL MODIFICATION **CERTIFIED MAIL**
MEDINA COUNTY

Street Address: Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329 Mailing Address: Lazarus Gov. Center

Application No: 16-01990

DATE: 4/26/2001

Plasti-Kote Co
Joel Dillingham
PO Box 708 1000 Lake Road
Medina, OH 44256

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 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. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo

Thomas G. Rigo
Field Operations and Permit Section
Division of Air Pollution Control

CC: **USEPA** **ARAQMD**
Allen Stegman **PLASTI-KOTE CO, INC**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install **Issue Date: 4/26/2001**
Terms and Conditions **Effective Date: 4/26/2001**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 16-01990

Application Number:	16-01990
APS Premise Number:	1652050060
Permit Fee:	**$0**
Name of Facility:	Plasti-Kote Co
Person to Contact:	Joel Dillingham
Address:	PO Box 708 1000 Lake Road Medina, OH 44256

Location of proposed air contaminant source(s) [emissions unit(s)]:
1000 Lake Rd
Medina, Ohio

Description of proposed emissions unit(s):
Administrative modification of PTI 16-01990 issued on February 9, 2000 for the Paint manufacturing equipment - addition of three new mixing tanks.

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described source(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install General Terms and Conditions

1. Monitoring and Related Recordkeeping and Reporting Requirements

a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

i. The date, place (as defined in the permit), and time of sampling or measurements.

ii. The date(s) analyses were performed.

iii. The company or entity that performed the analyses.

iv. The analytical techniques or methods used.

v. The results of such analyses.

vi. The operating conditions existing at the time of sampling or measurement.

b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

ii. Quarterly written reports of (i) any deviations from federally enforceable <u>emission limitations</u>, <u>operational restrictions</u>, <u>and control device operating parameter limitations</u>, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous

calendar quarters. See B.11 below if no deviations occurred during the quarter.

iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.
Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition

declared invalid.

6. General Requirements

a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d. This permit does not convey any property rights of any sort, or any exclusive privilege.

e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit To Install fees within 30 days after the issuance of this Permit To Install.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are

required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.

iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

10. Source Operation and Operating Permit Requirements After Completion of Construction

a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35 , the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the source(s) covered by this permit.

11. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

B. State Only Enforceable Permit To Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

4. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

5. Termination of Permit To Install

This permit to install shall terminate within eighteen months of the effective date of the permit to install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

6. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

7. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

8. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

9. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit To Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

10. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

C. Permit To Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons Per Year
Organic Compound	27.6
Combined HAPs	7.54
Individual HAP	3.38

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

None

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P018 - 1000 gallon paint mixing tank modified.	OAC rule 3745-31-05(A)(3)	2.3 lbs/hr of volatile organic compounds (VOC) 192.6 lbs/day of organic compounds (OC) 27.6 tons/yr of OC for P018, P019, and P020, combined The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2) as specified below.
	OAC rule 3745-31-05(D)	0.27 pound of individual hazardous air pollutant (HAP) per ton of paint produced 0.60 pound of combined HAPs per ton of paint produced 3.38 tons of individual HAP per year for P018, P019, and P020, combined, as a rolling 12-month summation 7.54 tons of combined HAPs per year for P018, P019, and P020, combined, as a rolling, 12-month summation See A.I.2.d and A.II.1 below.
	OAC rule 3745-21-07(G)(2)	40.0 lbs/day of VOC

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

See A.I.2.a below.

2. Additional Terms and Conditions

2.a Acetone and methylene chloride emissions are not "photochemically reactive" and, therefore, are not subject to the emission limitations established under OAC rule 3745-21-07(G)(2).

2.b The permittee shall employ a cover during mixing operation to reduce volatilization losses.

2.c The above hourly emission limit (regulated under OAC rule 3745-31-05) is based on the potential to emit for this emissions unit, as determined from permit application data and Emission Inventory Improvement Program (EIIP) emission calculation methodologies. Therefore, no record keeping, reporting, nor emissions calculations are required to demonstrate compliance with this emission limit.

2.d The annual OC, individual HAP, and combined HAPs emission limitations for emissions units P018, P019, and P020, combined, are based on producing all the paint in emissions unit P020 which results in the highest allowable annual emission limitations.

II. Operational Restrictions

1. The maximum annual production rate for emissions units P018, P019, and P020, combined, shall not exceed 22,500 tons of paint* based upon a rolling, 12-month summation of the production rates.

   To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the production levels specified in the following table:

Month	Maximum Allowable Cumulative Production
1	1,875 tons

1-2	3,750 tons
1-3	5,625 tons
1-4	7,500 tons
1-5	9,375 tons
1-6	11,250 tons
1-7	13,125 tons
1-8	15,000 tons
1-9	16,875 tons
1-10	18,750 tons
1-11	20,625 tons
1-12	22,500 tons

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual production rate limitation shall be based upon a rolling, 12-month summation of the production rates.

*For the purpose of this permit, paint is defined as being paint, paste, or concentrates.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:

   a. the total amount paint produced*, in tons;

   b. the OC emission rate, in pounds per day (i.e., multiply (a) by 2.21 pounds of OC per ton of paint produced*); and

   c. the VOC emission rate, in pounds per day (i.e., multiply (a) by 0.46 pound of VOC per ton of paint produced*).

   *The pounds of OC per ton of paint produced and pounds of VOC per ton of paint produced emission factors were derived using equations 8.4-1, 8.4-2, 8.4-3, 8.4-5, 8.4-17, and 8.4-18 from EIIP Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Volume II, Chapter 8, Section 4, dated March, 1998. For the purpose of this permit, paint is defined as including paint, paste, and concentrates.

2. The permittee shall maintain records of the following information for emissions units P018, P019, and P020, combined:

a. the paint production rate, the individual HAP emission rate, and the combined HAPs emission rate for each month; and

b. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the paint production rates, individual HAP emission rates, and the combined HAPs emission rates.

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative paint production rate, individual HAP emission rate, and the combined HAPs emission rate for each calendar month.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month production rate and emission rate limitations and, for the first 12 calendar months of operation the issuance of this permit, all exceedances of the maximum allowable cumulative production levels.

2. The permittee shall submit quarterly deviation (excursion) reports that identify each day during which the VOC emissions from this emissions unit exceeded 40.0 pounds per day, and the actual VOC emissions for each such day.

3. The permittee shall submit quarterly deviation (excursion) reports that identify each day during which the OC emissions from this emissions unit exceeded 192.6 pounds per day, and the actual OC emissions for each such day.

4. The deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part 1 - General Term and Condition A.1.c.

5. The permittee shall also submit annual reports which specify the total organic compound, the total individual HAP, and the total combined HAPs emissions from emissions units P018, P019, and P020, combined, for the previous calendar year. These reports shall be submitted by April 15 of each year.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

   a. <u>Emission Limitation</u>

      2.3 lbs/hr of VOC

      <u>Applicable Compliance Method</u>

      Compliance shall be demonstrated by multiplying the VOC emission factor of 0.46 pound of VOC per ton of paint produced by the maximum tons of painted produced per hour (5.0 tons per hour).

      The emission factor was derived using equations 8.4-1, 8.4-2, 8.4-3, 8.4-5, 8.4-17, and

8.4-18 from EIIP Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Volume II, Chapter 8, Section 4, dated March, 1998.

If required, the permittee shall demonstrate compliance with the above emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25 or 25A.

b. Emission Limitation

40 lbs/day of VOC

Applicable Compliance Method

Compliance shall be demonstrated based upon the daily record keeping requirements specified in section A.III.1 .

c. Emission Limitation

192.6 lbs/day of OC

Applicable Compliance Method

Compliance shall be demonstrated based upon the daily record keeping requirements specified in section A.III.1 .

d. Emission Limitation

27.6 tons/yr of OC for P018, P019, and P020, combined

Applicable Compliance Method

Compliance shall be demonstrated by multiplying the OC emission factor of 2.45 pounds of OC per ton of paint produced by the maximum allowable amount of paint produced per year (22,500 tons per year), and then dividing by 2000 lbs/ton.

The emission factor was derived using equations 8.4-1, 8.4-2, 8.4-3, 8.4-5, 8.4-17, and 8.4-18 from EIIP Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Volume II, Chapter 8, Section 4, dated March, 1998.

e. Emission Limitation

0.27 pound of individual HAP per ton of paint produced

Applicable Compliance Method

The emission limitation is equivalent to the emission factor derived using equations 8.4-1, 8.4-2, 8.4-3, 8.4-5, 8.4-17, and 8.4-18 from EIIP Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Volume II, Chapter 8, Section 4, dated March, 1998.

If required, the permittee shall demonstrate compliance based upon emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 18.

f. Emission Limitation

0.60 pound of combined HAPs per ton of paint produced

Applicable Compliance Method

The emission limitation is.equivalent to the emission factor derived using equations 8.4-1, 8.4-2, 8.4-3, 8.4-5, 8.4-17, and 8.4-18 from EIIP Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Volume II, Chapter 8, Section 4, dated March, 1998.

If required, the permittee shall demonstrate compliance based upon emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 18.

g. Emission Limitation

3.38 tons of individual HAP per year for P018, P019, and P020, combined, as a rolling 12-month summation

Applicable Compliance Method

Compliance shall be demonstrated by multiplying the individual HAP emission limitation of 0.30 pound of individual HAP per ton of paint produced by the amount of paint produced per rolling, 12-month period , and then dividing by 2000 lbs/ton.

h. Emission Limitation

7.54 tons of combined HAP per year for P018, P019, and P020, combined, as a rolling 12-month summation

Applicable Compliance Method

Compliance shall be demonstrated by multiplying the combined HAP emission limitation

of 0.67 pound of combined HAPs per ton of paint produced by the amount of paint produced per rolling, 12-month period , and then dividing by 2000 lbs/ton.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P018 - 1000 gallon paint mixing tank modified.	None	See B.III.1 below.

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit (P018) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

   Pollutant: Acetone

   TLV (mg/m3): 1187

Maximum Hourly Emission Rate (lbs/hr): 23.0*

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 3947

MAGLC (ug/m3): 28,267.9

Pollutant: Methyl Ethyl Ketone

TLV (mg/m3): 590

Maximum Hourly Emission Rate (lbs/hr): 2.2*

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 381.1

MAGLC (ug/m3): 14,047.6

Pollutant: Dichloromethane (Methylene Chloride)

TLV (mg/m3): 174

Maximum Hourly Emission Rate (lbs/hr): 4.2*

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 721.3

MAGLC (ug/m3): 4,142.9

*Combined hourly emission rate from emissions units P018, P019, and P020.

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup

materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	
P019 - 1000 gallon paint mixing tank modified.	OAC rule 3745-31-05(A)(3)	OAC rule 3745-21-07(G)(2)
	OAC rule 3745-31-05(D)	

Applicable Emissions Limitations/Control Measures	
2.3 lbs/hr of volatile organic compounds (VOC) 192.6 lbs/day of organic compounds (OC) 27.6 tons/yr of OC for P018, P019, and P020, combined The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2) as specified below. 0.27 pound of individual hazardous air pollutant (HAP) per ton of paint produced 0.60 pound of combined HAPs per ton of paint produced 3.38 tons of individual HAP per year for P018, P019, and P020, combined, as a rolling, 12-month summation 7.54 tons of combined HAPs per year for P018, P019, and P020, combined, as a rolling 12-month summation See A.I.2.d and A.II.1 below.	40.0 lbs/day of VOC The hourly emission limitation specified by this rule is less stringent than the hourly emission limitation established pursuant to OAC rule 3745-31-05(A)(3). See A.I.2.a below.

2. Additional Terms and Conditions

2.a Acetone and methylene chloride emissions are not "photochemically reactive" and, therefore, are not subject to the emission limitations established under OAC rule 3745-21-07(G)(2).

2.b The permittee shall employ a cover during mixing operation to reduce volatilization losses.

2.c The above hourly emission limit (regulated under OAC rule 3745-31-05) is based on the potential to emit for this emissions unit, as determined from permit application data and Emission Inventory Improvement Program (EIIP) emission calculation methodologies. Therefore, no record keeping, reporting, nor emissions calculations are required to demonstrate compliance with this emission limit.

2.d The annual OC, individual HAP, and combined HAPs emission limitations for emissions units P018, P019, and P020, combined, are based on producing all the paint in emissions unit P020 which results in the highest allowable annual emission limitations.

II. Operational Restrictions

1. The maximum annual production rate for emissions units P018, P019, and P020, combined, shall not exceed 22,500 tons of paint* based upon a rolling, 12-month summation of the production rates.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the production levels specified in the following table:

Month	Maximum Allowable Cumulative Production
1	1,875 tons
1-2	3,750 tons
1-3	5,625 tons
1-4	7,500 tons
1-5	9,375 tons
1-6	11,250 tons
1-7	13,125 tons
1-8	15,000 tons
1-9	16,875 tons
1-10	18,750 tons
1-11	20,625 tons
1-12	22,500 tons

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual production rate limitation shall be based upon a rolling, 12-month summation of the production rates.

*For the purpose of this permit, paint is defined as being paint, paste, or concentrates.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:

   a. the total amount paint produced*, in tons;

   b. the OC emission rate, in pounds per day (i.e., multiply (a) by 2.21 pounds of OC per ton of paint produced*); and

   c. the VOC emission rate, in pounds per day (i.e., multiply (a) by 0.46 pound of VOC per ton of paint produced*).

   *The pounds of OC per ton of paint produced and pounds of VOC per ton of paint produced emission factors were derived using equations 8.4-1, 8.4-2, 8.4-3, 8.4-5, 8.4-17, and 8.4-18 from EIIP Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Volume II, Chapter 8, Section 4, dated March, 1998. For the purpose of this permit, paint is defined as including paint, paste, and concentrates.

2. The permittee shall maintain records of the following information for emissions units P018, P019, and P020, combined:

   a. the paint production rate, the individual HAP emission rate, and the combined HAPs emission rate for each month; and

   b. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the paint production rates, individual HAP emission rates, and the combined HAPs emission rates.

   Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative paint production rate, individual HAP emission rate, and the combined HAPs emission rate for each calendar month.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month production rate and emission rate limitations and, for the first 12 calendar months of operation the issuance of this permit, all exceedances of the maximum allowable cumulative production levels.

2. The permittee shall submit quarterly deviation (excursion) reports that identify each day during which the VOC emissions from this emissions unit exceeded 40.0 pounds per day, and the actual VOC emissions for each such day.

3. The permittee shall submit quarterly deviation (excursion) reports that identify each day during which the OC emissions from this emissions unit exceeded 192.6 pounds per day, and the actual OC emissions for each such day.

4. The deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part 1 - General Term and Condition A.1.c.

5. The permittee shall also submit annual reports which specify the total organic compound, the total individual HAP, and the total combined HAPs emissions from emissions units P018, P019, and P020, combined, for the previous calendar year. These reports shall be submitted by April 15 of each year.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

   a. <u>Emission Limitation</u>

      2.3 lbs/hr of VOC

      <u>Applicable Compliance Method</u>

      Compliance shall be demonstrated by multiplying the VOC emission factor of 0.46 pound of VOC per ton of paint produced by the maximum tons of painted produced per hour (5.0 tons per hour).

      The emission factor was derived using equations 8.4-1, 8.4-2, 8.4-3, 8.4-5, 8.4-17, and

8.4-18 from EIIP Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Volume II, Chapter 8, Section 4, dated March, 1998.

If required, the permittee shall demonstrate compliance with the above emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25 or 25A.

b. Emission Limitation

40 lbs/day of VOC

Applicable Compliance Method

Compliance shall be demonstrated based upon the daily record keeping requirements specified in section A.III.1 .

c. Emission Limitation

192.6 lbs/day of OC

Applicable Compliance Method

Compliance shall be demonstrated based upon the daily record keeping requirements specified in section A.III.1 .

d. Emission Limitation

27.6 tons/yr of OC for P018, P019, and P020, combined

Applicable Compliance Method

Compliance shall be demonstrated by multiplying the OC emission factor of 2.45 pounds of OC per ton of paint produced by the maximum allowable amount of paint produced per year (22,500 tons per year), and then dividing by 2000 lbs/ton.

The emission factor was derived using equations 8.4-1, 8.4-2, 8.4-3, 8.4-5, 8.4-17, and 8.4-18 from EIIP Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Volume II, Chapter 8, Section 4, dated March, 1998.

e. Emission Limitation

0.27 pound of individual HAP per ton of paint produced

Applicable Compliance Method

The emission limitation is equivalent to the emission factor derived using equations 8.4-1,

8.4-2, 8.4-3, 8.4-5, 8.4-17, and 8.4-18 from EIIP Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Volume II, Chapter 8, Section 4, dated March, 1998.

If required, the permittee shall demonstrate compliance based upon emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 18.

f. Emission Limitation

0.60 pound of combined HAPs per ton of paint produced

Applicable Compliance Method

The emission limitation is.equivalent to the emission factor derived using equations 8.4-1, 8.4-2, 8.4-3, 8.4-5, 8.4-17, and 8.4-18 from EIIP Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Volume II, Chapter 8, Section 4, dated March, 1998.

If required, the permittee shall demonstrate compliance based upon emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 18.

g. Emission Limitation

3.38 tons of individual HAP per year for P018, P019, and P020, combined, as a rolling 12-month summation

Applicable Compliance Method

Compliance shall be demonstrated by multiplying the individual HAP emission limitation of 0.30 pound of individual HAP per ton of paint produced by the amount of paint produced per rolling, 12-month period , and then dividing by 2000 lbs/ton.

h. Emission Limitation

7.54 tons of combined HAP per year for P018, P019, and P020, combined, as a rolling 12-month summation

Applicable Compliance Method

Compliance shall be demonstrated by multiplying the combined HAP emission limitation

of 0.67 pound of combined HAPs per ton of paint produced by the amount of paint produced per rolling, 12-month period , and then dividing by 2000 lbs/ton.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P019 - 1000 gallon paint mixing tank modified.	None	See B.III.1 below.

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit (P019) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Acetone

TLV (mg/m3): 1187

Maximum Hourly Emission Rate (lbs/hr): 23.0*

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 3947

MAGLC (ug/m3): 28,267.9

Pollutant: Methyl Ethyl Ketone

TLV (mg/m3): 590

Maximum Hourly Emission Rate (lbs/hr): 2.2*

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 381.1

MAGLC (ug/m3): 14,047.6

Pollutant: Dichloromethane (Methylene Chloride)

TLV (mg/m3): 174

Maximum Hourly Emission Rate (lbs/hr): 4.2*

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 721.3

MAGLC (ug/m3): 4,142.9

*Combined hourly emission rate from emissions units P018, P019, and P020.

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup

materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	
P020 - 2000 gallon paint mixing tank modified.	OAC rule 3745-31-05(A)(3)	OAC rule 3745-21-07(G)(2)
	OAC rule 3745-31-05(D)	

Applicable Emissions Limitations/Control Measures	
2.56 lbs/hr of volatile organic compounds (VOC) 191.3 lbs/day of organic compounds (OC) 27.6 tons/yr of OC for P018, P019, and P020, combined The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2) as specified below. 0.30 pound of individual hazardous air pollutant (HAP) per ton of paint produced 0.67 pound of combined HAPs per ton of paint produced 3.38 tons of individual HAP per year for P018, P019, and P020, combined, as a rolling, 12-month summation 7.54 tons of combined HAPs per year for P018, P019, and P020, combined, as a rolling 12-month summation See A.II.1 below.	40.0 lbs/day of VOC The hourly emission limitation specified by this rule is less stringent than the hourly emission limitation established pursuant to OAC rule 3745-31-05(A)(3). See A.I.2.a below.

2. Additional Terms and Conditions

2.a Acetone and methylene chloride emissions are not "photochemically reactive" and, therefore, are not subject to the emission limitations established under OAC rule 3745-21-07(G)(2).

2.b The permittee shall employ a cover during mixing operation to reduce volatilization losses.

2.c The above hourly emission limit (regulated under OAC rule 3745-31-05) is based on the potential to emit for this emissions unit, as determined from permit application data and Emission Inventory Improvement Program (EIIP) emission calculation methodologies. Therefore, no record keeping, reporting, nor emissions calculations are required to demonstrate compliance with this emission limit.

II. Operational Restrictions

1. The maximum annual production rate for emissions units P018, P019, and P020, combined, shall not exceed 22,500 tons of paint* based upon a rolling, 12-month summation of the production rates.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the production levels specified in the following table:

Month	Maximum Allowable Cumulative Production
1	1,875 tons
1-2	3,750 tons
1-3	5,625 tons
1-4	7,500 tons
1-5	9,375 tons
1-6	11,250 tons
1-7	13,125 tons
1-8	15,000 tons
1-9	16,875 tons
1-10	18,750 tons
1-11	20,625 tons
1-12	22,500 tons

After the first 12 calendar months of operation following the issuance of this permit, compliance

with the annual production rate limitation shall be based upon a rolling, 12-month summation of the production rates.

*For the purpose of this permit, paint is defined as being paint, paste, or concentrates.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:

   a. the total amount paint produced*, in tons;

   b. the OC emission rate, in pounds per day (i.e., multiply (a) by 2.45 pounds of OC per ton of paint produced*); and

   c. the VOC emission rate, in pounds per day (i.e., multiply (a) by 0.51 pound of VOC per ton of paint produced*).

   *The pounds of OC per ton of paint produced and pounds of VOC per ton of paint produced emission factors were derived using equations 8.4-1, 8.4-2, 8.4-3, 8.4-5, 8.4-17, and 8.4-18 from EIIP Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Volume II, Chapter 8, Section 4, dated March, 1998. For the purpose of this permit, paint is defined as including paint, paste, and concentrates.

2. The permittee shall maintain records of the following information for emissions units P018, P019, and P020, combined:

   a. the paint production rate, the individual HAP emission rate, and the combined HAPs emission rate for each month; and

   b. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the paint production rates, individual HAP emission rates, and the combined HAPs emission rates.

   Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative paint production rate, individual HAP emission rate, and the combined HAPs emission rate for each calendar month.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month production rate and emission rate limitations and, for the first 12 calendar months of operation the issuance of this permit, all exceedances of the maximum allowable cumulative production levels.

2. The permittee shall submit quarterly deviation (excursion) reports that identify each day during

which the VOC emissions from this emissions unit exceeded 40.0 pounds per day, and the actual VOC emissions for each such day.

3. The permittee shall submit quarterly deviation (excursion) reports that identify each day during which the OC emissions from this emissions unit exceeded 191.3 pounds per day, and the actual OC emissions for each such day.

4. The deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part 1 - General Term and Condition A.1.c.

5. The permittee shall also submit annual reports which specify the total organic compound, the total individual HAP, and the total combined HAPs emissions from emissions units P018, P019, and P020, combined, for the previous calendar year. These reports shall be submitted by April 15 of each year.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

a. Emission Limitation

2.56 lbs/hr of VOC

Applicable Compliance Method

Compliance shall be demonstrated by multiplying the VOC emission factor of 0.51 pound of VOC per ton of paint produced by the maximum tons of painted produced per hour (5.0 tons per hour).

The emission factor was derived using equations 8.4-1, 8.4-2, 8.4-3, 8.4-5, 8.4-17, and 8.4-18 from EIIP Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Volume II, Chapter 8, Section 4, dated March, 1998.

If required, the permittee shall demonstrate compliance with the above emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25 or 25A.

b. Emission Limitation

40 lbs/day of VOC

Applicable Compliance Method

Compliance shall be demonstrated based upon the daily record keeping requirements specified in section A.III.1 .

c. Emission Limitation

191.3 lbs/day of OC

Applicable Compliance Method

Compliance shall be demonstrated based upon the daily record keeping requirements specified in section A.III.1 .

d. Emission Limitation

27.6 tons/yr of OC for P018, P019, and P020, combined

Applicable Compliance Method

Compliance shall be demonstrated by multiplying the OC emission factor of 2.45 pounds of OC per ton of paint produced by the maximum allowable amount of paint produced per year (22,500 tons per year), and then dividing by 2000 lbs/ton.

The emission factor was derived using equations 8.4-1, 8.4-2, 8.4-3, 8.4-5, 8.4-17, and 8.4-18 from EIIP Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Volume II, Chapter 8, Section 4, dated March, 1998.

e. Emission Limitation

0.30 pound of individual HAP per ton of paint produced

Applicable Compliance Method

The emission limitation is equivalent to the emission factor derived using equations 8.4-1, 8.4-2, 8.4-3, 8.4-5, 8.4-17, and 8.4-18 from EIIP Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Volume II, Chapter 8, Section 4, dated March, 1998.

If required, the permittee shall demonstrate compliance based upon emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 18.

f. Emission Limitation

0.67 pound of combined HAPs per ton of paint produced

Applicable Compliance Method

The emission limitation is.equivalent to the emission factor derived using equations 8.4-1, 8.4-2, 8.4-3, 8.4-5, 8.4-17, and 8.4-18 from EIIP Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Volume II, Chapter 8, Section 4, dated March, 1998.

If required, the permittee shall demonstrate compliance based upon emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 18.

g. Emission Limitation

3.38 tons of individual HAP per year for P018, P019, and P020, combined, as a rolling 12-month summation

Applicable Compliance Method

Compliance shall be demonstrated by multiplying the individual HAP emission limitation of 0.30 pound of individual HAP per ton of paint produced by the amount of paint produced per rolling, 12-month period , and then dividing by 2000 lbs/ton.

h. Emission Limitation

7.54 tons of combined HAP per year for P018, P019, and P020, combined, as a rolling 12-month summation

Applicable Compliance Method

Compliance shall be demonstrated by multiplying the combined HAP emission limitation of 0.67 pound of combined HAPs per ton of paint produced by the amount of paint produced per rolling, 12-month period , and then dividing by 2000 lbs/ton.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P020 - 2000 gallon paint mixing tank modified.	None	See B.III.1 below.

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit (P020) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Acetone

TLV (mg/m3): 1187

Maximum Hourly Emission Rate (lbs/hr): 23.0*

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 3947

MAGLC (ug/m3): 28,267.9

Pollutant: Methyl Ethyl Ketone

TLV (mg/m3): 590

Maximum Hourly Emission Rate (lbs/hr): 2.2*

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 381.1

MAGLC (ug/m3): 14,047.6

Pollutant: Dichloromethane (Methylene Chloride)

TLV (mg/m3): 174

Maximum Hourly Emission Rate (lbs/hr): 4.2*

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 721.3

MAGLC (ug/m3): 4,142.9

*Combined hourly emission rate from emissions units P018, P019, and P020.

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None