



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
MEDINA COUNTY**

CERTIFIED MAIL

Street Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center

Application No: 16-02317

DATE: 9/9/2003

Plasti-Kote Co
Tom Corpora
1000 Lake Rd
Medina, OH 44256

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging 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 Pollution Prevention at (614) 644-3469.

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
309 South Fourth Street, Room 222
Columbus, Ohio 43215

Sincerely,

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA

ARAQMD



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Permit To Install
Terms and Conditions**

**Issue Date: 9/9/2003
Effective Date: 9/9/2003**

FINAL PERMIT TO INSTALL 16-02317

Application Number: 16-02317
APS Premise Number: 1652050060
Permit Fee: **\$200**
Name of Facility: Plasti-Kote Co
Person to Contact: Tom Corpora
Address: 1000 Lake Rd
Medina, OH 44256

Location of proposed air contaminant source(s) [emissions unit(s)]:

**1000 Lake Rd
Medina, Ohio**

Description of proposed emissions unit(s):

Change in the Method of Operation of Spray Booth 4, K003. Replaces PTI 16-342 issued 5/30/85.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described emissions unit(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 and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

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 emission limitations, operational restrictions, and control device operating parameter limitations, 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.9 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. Permit To Operate Application

- 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 ninety (90) 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.

12. 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.

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

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

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

4. 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.

5. 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.

6. 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.

7. 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).

8. Construction Compliance Certification

Plasti-Kote Co

PTI Application: **16-02317****Issued: 9/9/2003**Facility ID: **1652050060**

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.

Plasti-Kote Co

Facility ID: 1652050060

PTI Application: 16-02317

Issued: 9/9/2003

9. **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**

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	64.0
VOC	35.0
PE	0.44
any individual HAP	9.0 as a rolling 12-month summation

12

Plasti-Kote Co

PTI Application: **16-02317**

Issued: 9/9/2003

Facility ID: **1652050060**

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

OAC rule 3745-31-05(D)

K003 - plastic cap coating line consisting of a binks HVLP automatic spray gun, conveyor, spray booth, heat lamp drying chamber - Spray Booth 4 (the terms and conditions of this permit supercede the terms and conditions in PTI 16-342 issued 5/30/1985).

OAC rule 3745-31-05(A)(3)

OAC rule 3745-17-07(A)

OAC rule 3745-17-11

OAC rule 3745-21-07(G)(2)

Applicable Emissions <u>Limitations/Control Measures</u>	9.0 tons of any individual hazardous air pollutant (HAP) per year from all coatings and cleanup materials employed, as a rolling 12-month summation
307.0 pounds of organic compounds (OC) per day for coatings	See A.II.1 below.
64.0 tons of OC per year from all coatings and cleanup materials employed	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
149.0 pounds of volatile organic compounds (VOC) per day for coatings	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
35.0 tons of VOC per year from all coatings and cleanup materials employed	When employing, applying, evaporating, or drying any photochemically reactive material, or substance containing such photochemically reactive material, the permittee shall not discharge more than 40 pounds of organic material into the atmosphere in any one day, nor more than 8 pounds of organic material in any one hour.
0.1 pound of particulate emissions (PE) per hour	See A.I.2.a below.
0.44 ton of PE per year	
Visible particulate emissions from any stack shall not exceed five percent opacity, as a six-minute average.	
The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D) and OAC rule 3745-21-07(G)(2).	
The maximum annual crackle top coating usage shall not exceed 1000 gallons based upon a rolling, 12-month summation of the coating usage figures.	

2. Additional Terms and Conditions

- 2.a** Note that acetone has been determined to be not photochemically reactive and therefore is not included in the emission limitations established under OAC rule 3745-21-07(G)(2).

II. Operational Restrictions

1. The maximum annual crackle top coating usage for this emissions unit shall not exceed 1000 gallons, based upon a rolling, 12-month summation of the crackle top coating usage figures.

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

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Coating Usage</u>
1	83.0 gallons
1-2	167.0 gallons
1-3	250.0 gallons
1-4	333.0 gallons
1-5	417.0 gallons
1-6	500.0 gallons
1-7	583.0 gallons
1-8	667.0 gallons
1-9	750.0 gallons
1-10	833.0 gallons
1-11	917.0 gallons
1-12	1000.0 gallons

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual crackle top coating usage limitation shall be based upon a rolling, 12-month summation of the crackle top coating usage figures.

2. The permittee shall operate a double frame filter when this emissions unit is in operation.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information:
 - a. the crackle top coating usage 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 crackle top coating usage figures.

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative crackle top coating usage for each calendar month.

2. The permittee shall maintain records of the following information for the coating line:
 - a. the MSDS sheets for each coating and cleanup material currently employed;
 - b. documentation as to whether or not each coating and cleanup material is a photochemically reactive material; and,

- c. when a new coating or cleanup material is going to be employed in the coating line, the permittee shall determine and document prior to employing the new coating or cleanup material whether or not it is a photochemically reactive material.
3. If it is determined that a photochemically reactive material is being employed in the coating line, the permittee shall collect and record the following information for each day for the coating line:
 - a. the company identification for each coating and cleanup material employed;
 - b. documentation of whether each coating or cleanup material employed is a photochemically reactive material;
 - c. the number of gallons of each coating and photochemically reactive cleanup material employed;
 - d. for each day during which a photochemically reactive material is employed, the total number of hours the emissions unit was in operation;
 - e. the permittee shall maintain information on each coating needed to calculate the OC emission rate (i.e., coating density, weight percent OC, etc.) in a spreadsheet. This information shall be updated by the permittee if any changes have been made to the coating formulations or if any new coatings are being employed;
 - f. the permittee shall maintain information on each photochemically reactive cleanup material needed to calculate the OC emission rate (i.e., cleanup material density, weight percent OC, etc.) in a spreadsheet. This information shall be updated by the permittee if any changes have been made to the cleanup material formulations or if any new cleanup materials are being employed;
 - g. for each day during which a photochemically reactive material is employed, the total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day;
 - h. for each day during which a photochemically reactive material is employed, the average hourly organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per hour (average) (i.e., (g)/(d)).

[Note: The definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

4. The permittee shall collect and record the following information each day for the coating line:
 - a. the name and identification number of each coating employed;
 - b. the volume, in gallons, of each coating employed;
 - c. the permittee shall maintain information on each coating needed to calculate OC and VOC emission rates (i.e., coating density, weight percent OC, weight percent VOC, etc.) in a

- spreadsheet. This information shall be updated by the permittee if any changes have been made to the coating formulations or if any new coatings are being employed;
- d. the total VOC emission rate for all coatings, in pounds per day; and,
 - e. the total OC emission rate for all coatings, in pounds per day.
5. The permittee shall collect and record the following information each month for the coating line:
- a. the name and identification number of each cleanup material employed;
 - b. the volume, in gallons, of each cleanup material employed;
 - c. the permittee shall maintain information on each cleanup material needed to calculate OC and VOC emission rates (i.e., cleanup material density, weight percent OC, etc.) in a spreadsheet. This information shall be updated by the permittee if any changes have been made to the cleanup material formulations or if any new cleanup materials are being employed;
 - d. the OC emission rate for all coatings, in tons per month (i.e., the sum of the daily OC emissions in Section A.III.4.e above for each month, then divided by 2000);
 - e. the VOC emission rate for all coatings, in tons per month (i.e., the sum of the daily VOC emissions in Section A.III.4.d above for each month, then divided by 2000);
 - f. the OC emission rate for all cleanup materials, in tons per month;
 - g. the VOC emission rate for all cleanup materials, in tons per month;
 - h. the total OC emission rate for all cleanup materials and coatings, in tons per month (i.e., (d) plus (f)); and
 - i. the total VOC emission rate for all cleanup materials and coatings, in tons per month (i.e., (e) plus (g)).
6. The permittee shall collect and record the following information each month for the coating line:
- a. the name and identification number of each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup material employed;

- c. the permittee shall maintain information on each coating and cleanup material needed to calculate each individual HAP emission rate (i.e., coating density, weight percent of each

HAP, etc.) in a spreadsheet. This information shall be updated by the permittee if any changes have been made to the coating and/or cleanup material formulations or if any new coatings and/or cleanup materials are being employed;

- d. the total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in tons per month;
- e. during the first 12 calendar months of operations following the issuance of this permit, the cumulative emissions of each individual HAP for each calendar month; and
- f. beginning after the first 12 calendar months of operations following the issuance of this permit, the rolling, 12-month summation of the monthly emissions of each individual HAP for each calendar month.

* A listing of the HAPs can be found in section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials.

7. The permittee shall document whether or not the double frame filter was in service when the emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month crackle top coating usage limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative crackle top coating usage levels.
2. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. for the days during which a photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and,
 - b. for the days during which a photochemically reactive material was employed, an identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

Emissions Unit ID: K003

3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for any individual HAP and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.
4. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any record showing that the double frame filter was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
5. The permittee shall submit deviation (excursion) reports which include an identification of each day during which the VOC emissions exceeded 149.0 pounds per day, and the actual daily VOC emissions for each such day.
6. The permittee shall submit deviation (excursion) reports which include an identification of each day during which the OC emissions exceeded 307.0 pounds per day, and the actual daily OC emissions for each such day.
7. The permittee shall also submit annual reports which specify the total OC and the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year.
8. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

V. Testing Requirements

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

- a. Emission Limitation

8.0 pounds of organic compounds (OC) per hour

40 pounds of OC per day

- a. Applicable Compliance Method

Record keeping of coating and photochemically reactive cleanup material usage, organic compound content of each coating and photochemically reactive cleanup material, and operating hours per day as required in Section A.III.3 above. Formulation data or USEPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the organic compound contents of the coatings and photochemically reactive cleanup materials.

b. Emission Limitation

Visible particulate emissions from any stack shall not exceed five percent opacity, as a six-minute average.

Applicable Compliance Method

OAC rule 3745-17-03(B)(1)

c. Emission Limitation

0.1 pound of PE per hour

Applicable Compliance Method:

To determine the actual worst case particulate emissions rate, the following equation shall be used:

$$E = \text{maximum coating solids usage rate in pounds per hour} \times (1-TE) \times (1-CE)$$

E = particulate emissions rate (pounds per hour)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used = 0.75

CE = fractional control efficiency of the control equipment = 0.90

d. Emission Limitation:

0.44 ton of PE per year

Applicable Compliance Method:

Multiply the allowable PE limitation by 8760 hours per year, and then divide by 2000 pounds per ton.

e. Emission Limitation

149.0 pounds of VOC per day for coatings

Applicable Compliance Method

Record keeping of coating usage and the VOC content of each coating as required in Section A.III.4 above. Formulation data or US EPA Methods 24 or 24A shall be used to determine the VOC content for each coating.

f. Emission Limitation

35.0 tons of VOC per year from all coatings and cleanup materials employed

Applicable Compliance Method

Record keeping of coating and cleanup material usage and the VOC content of each coating and cleanup material as required in Sections A.III.4 and A.III.5 above. Formulation data or US EPA Methods 24 or 24A shall be used to determine the VOC content for each coating.

g. Emission Limitation

307.0 pounds of OC per day for coatings

Applicable Compliance Method

Record keeping of coating usage and the OC content of each coating as required in Section A.III.4 above. Formulation data shall be used to determine the OC content for each coating.

h. Emission Limitation

64.0 tons of OC per year from all coatings and cleanup materials employed

Applicable Compliance Method

Record keeping of coating and cleanup material usage and the OC content of each coating and cleanup material as required in Sections A.III.4 and A.III.5 above. Formulation data shall be used to determine the OC content for each coating.

i. Emission Limitation

9.0 tons of any individual HAP per year from all coatings and cleanup materials employed, as a rolling 12-month summation

Applicable Compliance Method

Record keeping of coating and cleanup material usage and the HAP content of each coating and cleanup material as required in Sections A.III.6 above. Formulation data shall be used to determine the HAP content for each coating.

VI. Miscellaneous Requirements

1. The terms and conditions in this permit to install 16-02317 shall supercede all the air pollution control requirements for K003 in permit to install 16-342.

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K003 - plastic cap coating line consisting of a binks HVLP automatic spray gun, conveyor, spray booth, heat lamp drying chamber - Spray Booth 4 (the terms and conditions of this permit supercede the terms and conditions in PTI 16-342 issued 5/30/1985).	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 (K003) was evaluated based on the actual materials (typically coatings and cleanup 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): 7.95

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 1302.0

MAGLC (ug/m³): 28261.9

Pollutant: Isopropyl Alcohol

TLV (mg/m³): 983

Maximum Hourly Emission Rate (lbs/hr): 0.26

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 42.7

MAGLC (ug/m³): 23404.8

Pollutant: Methyl Ethyl Ketone

TLV (mg/m³): 590

Maximum Hourly Emission Rate (lbs/hr): 2.76

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 452.8

MAGLC (ug/m³): 14047.6

Pollutant: Methyl Isobutyl Ketone

TLV (mg/m³): 205

Maximum Hourly Emission Rate (lbs/hr): 1.25

Predicted 1-Hour Maximum Ground-Level

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Emissions Unit ID: K003

Concentration (ug/m3): 205.1

MAGLC (ug/m3): 4881.0

Pollutant: Toluene

TLV (mg/m³): 188

Maximum Hourly Emission Rate (lbs/hr): 1.99

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 326.5

MAGLC (ug/m³): 4476.2

Pollutant: Xylene

TLV (mg/m³): 434

Maximum Hourly Emission Rate (lbs/hr): 2.72

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 446.2

MAGLC (ug/m³): 10333.3

Pollutant: Methyl Acetate

TLV (mg/m³): 606

Maximum Hourly Emission Rate (lbs/hr): 2.47

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 405.2

MAGLC (ug/m³): 14428.6

Pollutant: Ethyl Benzene

TLV (mg/m³): 434

Maximum Hourly Emission Rate (lbs/hr): 0.56

Predicted 1-Hour Maximum Ground-Level

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Issued: 9/9/2003

Emissions Unit ID: K003

Concentration (ug/m³): 91.9

MAGLC (ug/m³): 10333.3

Pollutant: Ethyl Acetate

TLV (mg/m³): 1440

Maximum Hourly Emission Rate (lbs/hr): 0.59

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 96.8

MAGLC (ug/m³): 34285.7

Pollutant: Isobutyl Acetate

TLV (mg/m³): 152

Maximum Hourly Emission Rate (lbs/hr): 1.25

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 205.1

MAGLC (ug/m³): 3619.1

Pollutant: Diisobutyl Ketone

TLV (mg/m³): 145

Maximum Hourly Emission Rate (lbs/hr): 0.55

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 90.2

MAGLC (ug/m³): 3452.4

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

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None