

**Synthetic Minor Determination and/or**  **Netting Determination**

Permit To Install 16-02334

**A. Source Description**

Plasti-Kote Company, Inc. has requested to limit the potential to emit for the following sources that are listed as insignificant emissions unit on their Title V permit: SW Mill (P027), Tank L-1 (P028), Premixing Stations #1 and #2 (P029 and P030), Car Color Paint Mixing Stations (P031-P038), and QC Spray Booth (R007).

**B. Facility Emissions and Attainment Status**

The Title V permit limits the entire facility to 249.4 tons of volatile organic compounds (VOC) per year, 9.5 tons of individual hazardous air pollutants (HAP), and 24.5 tons of combined hazardous air pollutants (HAPs). The Title V permit also listed potential to emit numbers for VOC, individual HAP, and combined HAPs for the sources listed above.

**C. Source Emissions**

The following table summarizes the potential to emit for VOC, individual HAP, and combined HAP for the insignificant emissions units listed above.

<u>Emissions Unit</u>	<u>Potential to Emit for VOC (ton(s) per year)</u>	<u>Potential to Emit for individual HAP (ton(s) per year)</u>	<u>Potential to Emit for combined HAPs (ton(s) per year)</u>
P027	1.27	0.34	0.58
P028	1.71	1.57	1.71
P029	1.27	0.31	0.63
P030	1.27	0.31	0.63
P031	0.48	0.33	0.68
P032	0.48	0.33	0.68
P033	0.48	0.33	0.68
P034	0.48	0.33	0.68
P035	0.48	0.33	0.68
P036	0.48	0.33	0.68
P037	0.48	0.33	0.68
P038	0.48	0.33	0.68
<u>R007</u>	<u>5.30</u>	<u>0.53</u>	<u>1.49</u>
Total	14.66	5.70	10.48

The following table summarizes the requested limits on potential to emit established with usage and production limitations for the insignificant emissions units.

<u>Emissions Unit</u>	<u>Potential to Emit for VOC (ton(s) per year)</u>	<u>Potential to Emit for individual HAP (ton(s) per year)</u>	<u>Potential to Emit for combined HAPs (ton(s) per year)</u>
P027	0.65	0.18	0.30
P028	0.97	0.88	0.97
P029-P030	0.26	0.06	0.13
P031-P038 and Z044-Z049	0.21	0.14	0.29
<u>R007</u>	<u>0.78</u>	<u>0.08</u>	<u>0.22</u>
Total	2.87	1.34	1.91

**D. Conclusion**

By establishing usage and production restrictions, the insignificant emissions unit's potentials to emit will match the potential to emit numbers established in the Title V permit. Through record keeping and reporting requirements, the permittee will show that these insignificant emissions units do not exceed the potential to emit numbers in the Title V permit.



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL CERTIFIED MAIL  
MEDINA COUNTY**

Street Address:

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

Mailing Address:

Lazarus Gov.  
Center

**Application No: 16-02334**

**DATE: 1/13/2004**

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

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$4050** will be due. Please do not submit any payment now.

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. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

*Michael W. Ahern*

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

CC: USEPA

ARAQMD

**PUBLIC NOTICE**  
**ISSUANCE OF DRAFT PERMIT TO INSTALL 16-02334 FOR AN AIR CONTAMINANT SOURCE FOR**  
**PLASTI-KOTE CO**

On 1/13/2004 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Plasti-Kote Co**, located at **1000 Lake Rd, Medina, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 16-02334:

**Post-Installation PTI for Insignificant Emissions Units Production Room, Mixing Room 1, and QC Lab.**

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Lynn Malcolm, Akron Regional Air Quality Management District, 146 South High Street, Room 904, Akron, OH 44308 [(330)375-2480]



**Permit To Install  
Terms and Conditions**

**Issue Date: To be entered upon final issuance  
Effective Date: To be entered upon final issuance**

**DRAFT PERMIT TO INSTALL 16-02334**

Application Number: 16-02334  
APS Premise Number: 1652050060  
Permit Fee: **To be entered upon final issuance**  
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):  
**Post-Installation PTI for Insignificant Emissions Units Production Room, Mixing Room 1, and QC Lab.**

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

Plasti-Kote Co

Facility ID: 1652050060

PTI Application: 16-02334

Issued: To be entered upon final issuance

**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.

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- 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

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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

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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.

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#### **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.

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**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**

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. 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

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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 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.

## **8. Construction Compliance Certification**

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the

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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.

**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	3.69
VOC	2.87
PE	6.11
individual HAP	1.34
combined HAPs	1.91

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**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

Plasti-  
PTI A

Emissions Unit ID: P027

Issued: To be entered upon final issuance

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

P027 - Raw materials handling, paint mixing tank, paint storage tank, spray can filling line - SW Mill.	OAC rule 3745-31-05(A)(3)
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OAC rule 3745-17-07(A)

OAC rule 3745-17-11

OAC rule 3745-31-05(C)

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

**Plasti-  
PTI A**

Emissions Unit ID: P027

**Issued: To be entered upon final issuance**

Applicable Emissions Limitations/Control Measures	
0.29 pound of volatile organic compounds/organic compounds (VOC/OC) per hour	0.18 ton of individual HAP per year, as a rolling 12-month summation
0.65 pound of particulate emissions (PE) per hour	0.30 ton of combined HAPs per year, as a rolling 12-month summation
2.85 tons of PE per year	See A.II.1 below.
Visible particulate emissions from any stack shall not exceed ten percent opacity, as a six-minute average.	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C).	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
0.00131 pound of VOC/OC per gallon of paint paste produced	The emission limitations specified by this rule are less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
0.000355 pound of individual hazardous air pollutant (HAP) per gallon of paint paste produced	
0.000610 pound of combined hazardous air pollutants (HAPs) per gallon of paint paste produced	
0.65 ton of VOC/OC per year, as a rolling 12-month summation	

**Issued: To be entered upon final issuance****2. Additional Terms and Conditions**

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

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

**II. Operational Restrictions**

1. The maximum annual paint paste production rate for this emissions unit shall not exceed 992,888 gallons, 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 paint paste production levels specified in the following table:

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<u>Month</u>	<u>Maximum Allowable Cumulative Paint Paste Production</u>
1	82,741 gallons
1-2	165,481 gallons
1-3	248,222 gallons
1-4	330,963 gallons
1-5	413,703 gallons
1-6	496,444 gallons
1-7	579,185 gallons
1-8	661,925 gallons
1-9	744,666 gallons
1-10	827,407 gallons
1-11	910,147 gallons
1-12	992,888 gallons

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

**III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall maintain monthly records of the following information:
  - a. the paint paste production 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 paste production rates.

Also, during the first 12 calendar months of operation following this issuance of this permit, the permittee shall record the cumulative paint paste production rate for each calendar month.

2. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack(s) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;

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Emissions Unit ID: P027

- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

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- d. the total duration of any visible emission incident; and
- e. any corrective actions taken to eliminate the visible emissions.

**IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month paint paste production rate limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative paint paste production levels.
2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack(s) serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.
3. The deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part 1 - 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:  
  
0.29 pound of VOC/OC per hour  
  
Applicable Compliance Method:  
  
Compliance shall be demonstrated by multiplying the EIIP derived VOC/OC emission factor of 0.00131 pound of VOC/OC per gallon of paint paste produced by the maximum hourly production rate.
  - b. Emission Limitation:  
  
0.65 pound of PE per hour  
  
Applicable Compliance Method:

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Compliance shall be demonstrated by multiplying the particulate emission factor of 0.01 pound of PE per pound of pigment handled\* by the maximum hourly amount of pigment handled times (1-0.81\*\*). Stack testing may be required in the future in accordance with the test method(s) and procedures in OAC rule 3745-17-03(B)(10).

\*AP-42 Chapter 6.4 under 6.4.2 states particulate emissions amount to 0.5 - 1.0% of pigment handled.

\*\*overall control efficiency of the baghouse/fabric filter.

c. Emission Limitation:

2.85 tons of PE per year

Applicable Compliance Method:

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

d. Emission Limitation:

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

Applicable Compliance Method:

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

e. Emission Limitations:

0.00131 pound of VOC/OC per gallon of paint paste produced

0.000355 pound of individual HAP per gallon of paint paste produced

0.000610 pound of combined HAPs per gallon of paint paste produced

Applicable Compliance Method:

The emission limitations are equivalent to the emission factors derived using equations from EIIP Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Volume II, Chapter 8, Section 4, Revised Final August 2000, Updated March 14, 2002 and the "worst case" solvent mixture.

f. Emission Limitation:

0.65 ton of VOC/OC per year, as a rolling 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the EIP derived VOC/OC emission factor of 0.00131 pound of VOC/OC per gallon of paint paste produced by the maximum allowable amount of paint paste produced per year (992,888 gallons per year), and then dividing by 2000 pounds per ton.

g. Emission Limitation:

0.18 ton of individual HAP per year, as a rolling 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the EIP derived individual HAP emission factor of 0.000355 pound of individual HAP per gallon of paint paste produced by the maximum allowable amount of paint paste produced per year (992,888 gallons per year), and then dividing by 2000 pounds per ton.

h. Emission Limitation:

0.30 ton of combined HAPs per year, as a rolling 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the EIP derived combined HAPs emission factor of 0.000610 pound of combined HAPs per gallon of paint paste produced by the maximum allowable amount of paint paste produced per year (992,888 gallons per year), and then dividing by 2000 pounds per ton.

**VI. Miscellaneous Requirements**

None

**Plasti-  
PTI A**

Emissions Unit ID: P027

**Issued: To be entered upon final issuance**

**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>
P027 - Raw materials handling, paint mixing tank, paint storage tank, spray can filling line - SW Mill.	None	See B.VI.1 below.

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary

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Emissions Unit ID: P027

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because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit

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**Issued: To be entered upon final issuance**

to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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PTI A

Emissions Unit ID: P028

Issued: To be entered upon final issuance

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
P028 - Paint mixing tank - Tank L-1.	OAC rule 3745-31-05(A)(3)	OAC rule 3745-21-07(G)(2)
	OAC rule 3745-31-05(C)	

**Plasti-Kote Co****PTI Application: 16-02224****Issued****Facility ID: 1652050060**

Emissions Unit ID: P028

Applicable Emissions  
Limitations/Control  
Measures

0.39 pound of volatile organic compounds/organic compounds (VOC/OC) per hour

The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C).

0.000608 pound of VOC/OC per gallon of paint concentrate produced

0.000555 pound of individual hazardous air pollutant (HAP) per gallon of paint concentrate produced

0.000608 pound of combined hazardous air pollutants (HAPs) per gallon of paint concentrate produced

0.97 ton of VOC/OC per year, as a rolling 12-month summation

0.88 ton of individual HAP per year, as a rolling 12-month summation

0.97 ton of combined HAPs per year, as a rolling 12-month summation

See A.II.1 below.

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

**Issued: To be entered upon final issuance****2. Additional Terms and Conditions**

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

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

**II. Operational Restrictions**

1. The maximum annual paint concentrate production rate for this emissions unit shall not exceed 3,184,596 gallons, 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 paint concentrate production levels specified in the following table:

<u>Month</u>	<u>Maximum Allowable Cumulative Paint Concentrate Production</u>
1	256,383 gallons
1-2	530,766 gallons
1-3	796,149 gallons
1-4	1,061,532 gallons
1-5	1,326,915 gallons
1-6	1,592,298 gallons
1-7	1,857,681 gallons
1-8	2,123,064 gallons
1-9	2,388,447 gallons
1-10	2,653,830 gallons
1-11	2,919,213 gallons
1-12	3,184,596 gallons

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

**III. Monitoring and/or Recordkeeping Requirements**

**Issued: To be entered upon final issuance**

1. The permittee shall maintain monthly records of the following information:
  - a. the paint concentrate production 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 concentrate production rates.

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative paint concentrate production 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 paint concentrate production rate limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative paint concentrate production levels.
2. The deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part 1 - 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:

0.39 pound of VOC/OC per hour

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the EIP derived VOC/OC emission factor of 0.000608 pound of VOC/OC per gallon of paint concentrate produced by the maximum hourly production rate.

- b. Emission Limitations:

0.000608 pound of VOC/OC per gallon of paint concentrate produced  
0.000555 pound of individual HAP per gallon of paint concentrate produced  
0.000608 pound of combined HAPs per gallon of paint concentrate produced

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**Plasti-Kote Co**

**PTI Application: 16-02334**

**Issued**

**Facility ID: 1652050060**

Emissions Unit ID: P028

**Issued: To be entered upon final issuance**Applicable Compliance Method:

The emission limitations are equivalent to the emission factors derived using equations from EIIP Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Volume II, Chapter 8, Section 4, Revised Final August 2000, Updated March 14, 2002 and the "worst case" solvent mixture.

c. Emission Limitation:

0.97 ton of VOC/OC per year, as a rolling 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the EIIP derived VOC/OC emission factor of 0.000608 pound of VOC/OC per gallon of paint concentrate produced by the maximum allowable amount of paint concentrate produced per year (3,184,596 gallons per year), and then dividing by 2000 pounds per ton.

d. Emission Limitation:

0.88 ton of individual HAP per year, as a rolling 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the EIIP derived individual HAP emission factor of 0.000555 pound of individual HAP per gallon of paint concentrate produced by the maximum allowable amount of paint concentrate produced per year (3,184,596 gallons per year), and then dividing by 2000 pounds per ton.

e. Emission Limitation:

0.97 ton of combined HAPs per year, as a rolling 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the EIIP derived combined HAPs emission factor of 0.000608 pound of combined HAPs per gallon of paint concentrate produced by the maximum allowable amount of paint concentrate produced per year (3,184,596 gallons per year), and then dividing by 2000 pounds per ton.

**VI. Miscellaneous Requirements**

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Emissions Unit ID: P028

None

**Issued: To be entered upon final issuance**

**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>
P028 - Paint mixing tank - Tank L-1.	None	See B.VI.1 below.

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

- 1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a

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PTI A**

Emissions Unit ID: P028

**Issued: To be entered upon final issuance**

new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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Emissions Unit ID: P029

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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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>
P029 - Raw materials handling, paint mixing tank, grinding, paint storage tank - Premixing Station Number 1.	OAC rule 3745-31-05(A)(3)
	OAC rule 3745-31-05(C)
	OAC rule 3745-17-07(A)

Emissions Unit ID: P029

OAC rule 3745-17-11	Applicable Emissions Limitations/Control Measures	
OAC rule 3745-21-07(G)(2)	0.29 pound of volatile organic compounds/organic compounds (VOC/OC) per hour	2.03 tons of PE per year for P029 and P030, combined, as a rolling, 12-month summation  See A.II.1 below.
	2.26 pounds of particulate emissions (PE) per hour	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	Visible particulate emissions from any stack shall not exceed ten percent opacity, as a six-minute average.	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C).	The emission limitations specified by this rule are less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	0.000999 pound of VOC/OC per gallon of paint concentrate produced	
	0.000244 pound of individual hazardous air pollutant (HAP) per gallon of paint concentrate produced	
	0.000498 pound of combined hazardous air pollutants (HAPs) per gallon of paint concentrate produced	
	0.0078 pound of PE per gallon of paint concentrate produced	
	0.26 ton of VOC/OC per year for P029 and P030, combined, as a rolling, 12-month summation	
	0.06 ton of individual HAP per year for P029 and P030, combined, as a rolling, 12-month summation	
	0.13 ton of combined HAPs per year for P029 and P030, combined, as a rolling, 12-month summation	

**Issued: To be entered upon final issuance****2. Additional Terms and Conditions**

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

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

**II. Operational Restrictions**

1. The maximum annual paint concentrate production rate for emissions units P029 and P030 shall not exceed 520,316 gallons, 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 paint concentrate production levels specified in the following table:

<u>Month</u>	<u>Maximum Allowable Cumulative Paint Concentrate Production</u>
1	43,360 gallons
1-2	86,719 gallons
1-3	130,079 gallons
1-4	173,439 gallons
1-5	216,798 gallons
1-6	260,158 gallons
1-7	303,518 gallons
1-8	346,877 gallons
1-9	390,237 gallons
1-10	433,597 gallons
1-11	476,956 gallons
1-12	520,316 gallons

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

**Issued: To be entered upon final issuance****III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall maintain monthly records of the following information for emissions units P029 and P030 combined:
  - a. the paint concentrate production 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 concentrate production rates.

Also, during the first 12 calendar months of operation following this issuance of this permit, the permittee shall record the cumulative paint concentrate production rate for each calendar month.

2. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack(s) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to eliminate the visible emissions.

**IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month paint concentrate production rate limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative paint concentrate production levels.
2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack(s) serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency)

Emissions Unit ID: P029

by January 31 and July 31 of each year and shall cover the previous 6-month period.

3. The deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part 1 - 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:

0.29 pound of VOC/OC per hour

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the EIIP derived VOC/OC emission factor of 0.000999 pound of VOC/OC per gallon of paint concentrate produced by the maximum hourly production rate.

- b. Emission Limitation:

2.26 pound of PE per hour

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the particulate emission factor of 0.005 pound of PE per pound of pigment handled\* by the maximum hourly amount of pigment handled. Stack testing may be required in the future in accordance with the test method(s) and procedures in OAC rule 3745-17-03(B)(10).

\*AP-42 Chapter 6.4 under 6.4.2 states particulate emissions amount to 0.5 - 1.0% of pigment handled. Used 0.5% because emissions unit is located inside the building.

- c. Emission Limitation:

2.03 tons of PE per year for P029 and P030, combined, as a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the particulate emission factor of 0.0078 pound of particulate emissions per gallon of paint concentrate produced by the maximum allowable amount of paint paste produced per year (520,316 gallons per year), and then

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dividing by 2000 pounds per ton.

d. Emission Limitation:

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

Applicable Compliance Method:

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

e. Emission Limitations:

0.000999 pound of VOC/OC per gallon of paint concentrate produced  
0.000244 pound of individual HAP per gallon of paint concentrate produced  
0.000498 pound of combined HAPs per gallon of paint concentrate produced

Applicable Compliance Method:

The emission limitations are equivalent to the emission factors derived using equations from EIIIP Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Volume II, Chapter 8, Section 4, Revised Final August 2000, Updated March 14, 2002 and the "worst case" solvent mixture.

f. Emission Limitation:

0.0078 pound of PE per gallon of paint concentrate produced

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the particulate emission factor of 0.005 pound of particulate emissions per pound of pigment handled\* by the maximum hourly amount of pigment handled, then divided by the maximum gallons processed per hour.

\*AP-42 Table 6.4-1 Note (d) dated 5/83.

g. Emission Limitation:

0.26 ton of VOC/OC per year for P029 and P030, combined, as a rolling, 12-month summation

Emissions Unit ID: P029

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the EIIP derived VOC/OC emission factor of 0.000999 pound of VOC/OC per gallon of paint concentrate produced by the maximum allowable amount of paint concentrate produced per year (520,316 gallons per year), and then dividing by 2000 pounds per ton.

h. Emission Limitation:

0.06 ton of individual HAP per year for P029 and P030, combined, as a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the EIIP derived individual HAP emission factor of 0.000244 pound of individual HAP per gallon of paint concentrate produced by the maximum allowable amount of paint concentrate produced per year (520,316 gallons per year), and then dividing by 2000 pounds per ton.

i. Emission Limitation:

0.30 ton of combined HAPs per year for P029 and P030, combined, as a rolling, 12-month summation

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Emissions Unit ID: P029

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Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the EIIP derived combined HAPs emission factor of 0.000498 pound of combined HAPs per gallon of paint concentrate produced by the maximum allowable amount of paint concentrate produced per year (530,316 gallons per year), and then dividing by 2000 pounds per ton.

**VI. Miscellaneous Requirements**

None

**Plasti-  
PTI A**

Emissions Unit ID: P029

**Issued: To be entered upon final issuance**

**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>
P029 - Raw materials handling, paint mixing tank, grinding, paint storage tank - Premixing Station Number 1.	None	See B.VI.1 below.

**2. Additional Terms and Conditions**

**2.a** None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary

**Plasti-  
PTI A**

Emissions Unit ID: P029

**Issued: To be entered upon final issuance**

because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit

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**Issued: To be entered upon final issuance**

to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

Plasti-  
PTI A

Emissions Unit ID: P030

Issued: To be entered upon final issuance

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>
P030 - Raw material handling, paint mixing tank, grinding, paint storage tank - Premixing Station Number 2.	OAC rule 3745-31-05(A)(3)
	OAC rule 3745-31-05(C)
	OAC rule 3745-17-07(A)

Plasti-Kote Co  
 PTI Application: 16-02224  
 Issued

Facility ID: 1652050060

Emissions Unit ID: P030

OAC rule 3745-17-11	Applicable Emissions Limitations/Control Measures	
OAC rule 3745-21-07(G)(2)	0.29 pound of volatile organic compounds/organic compounds (VOC/OC) per hour	2.03 tons of PE per year for P029 and P030, combined, as a rolling, 12-month summation See A.II.1 below.
	2.26 pounds of particulate emissions (PE) per hour	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	Visible particulate emissions from any stack shall not exceed ten percent opacity, as a six-minute average.	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C).	The emission limitations specified by this rule are less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	0.000999 pound of VOC/OC per gallon of paint concentrate produced	
	0.000244 pound of individual hazardous air pollutant (HAP) per gallon of paint concentrate produced	
	0.000498 pound of combined hazardous air pollutants (HAPs) per gallon of paint concentrate produced	
	0.0078 pound of PE per gallon of paint concentrate produced	
	0.26 ton of VOC/OC per year for P029 and P030, combined, as a rolling, 12-month summation	
	0.06 ton of individual HAP per year for P029 and P030, combined, as a rolling, 12-month summation	
	0.13 ton of combined HAPs per year for P029 and P030, combined, as a rolling, 12-month summation	

**Issued: To be entered upon final issuance****2. Additional Terms and Conditions**

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

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

**Issued: To be entered upon final issuance**

**II. Operational Restrictions**

1. The maximum annual paint concentrate production rate for emissions units P029 and P030 shall not exceed 520,316 gallons, 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 paint concentrate production levels specified in the following table:

<u>Month</u>	<u>Maximum Allowable Cumulative Paint Concentrate Production</u>
1	43,360 gallons
1-2	86,719 gallons
1-3	130,079 gallons
1-4	173,439 gallons
1-5	216,798 gallons
1-6	260,158 gallons
1-7	303,518 gallons
1-8	346,877 gallons
1-9	390,237 gallons
1-10	433,597 gallons
1-11	476,956 gallons
1-12	520,316 gallons

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

**III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall maintain monthly records of the following information for emissions units P029 and P030 combined:
  - a. the paint concentrate production 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 concentrate production rates.

Also, during the first 12 calendar months of operation following this issuance of this permit, the permittee shall record the cumulative paint concentrate production rate for each calendar month.

2. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack(s) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to eliminate the visible emissions.

#### **IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month paint concentrate production rate limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative paint concentrate production levels.
2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack(s) serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.
3. The deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part 1 - 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:  
  
0.29 pound of VOC/OC per hour  
  
Applicable Compliance Method:

Emissions Unit ID: P030

Compliance shall be demonstrated by multiplying the EIP derived VOC/OC emission factor of 0.000999 pound of VOC/OC per gallon of paint concentrate produced by the maximum hourly production rate.

b. Emission Limitation:

2.26 pound of PE per hour

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the particulate emission factor of 0.005 pound of PE per pound of pigment handled\* by the maximum hourly amount of pigment handled. Stack testing may be required in the future in accordance with the test method(s) and procedures in OAC rule 3745-17-03(B)(10).

\*AP-42 Chapter 6.4 under 6.4.2 states particulate emissions amount to 0.5 - 1.0% of pigment handled. Used 0.5% because emissions unit is located inside the building.

c. Emission Limitation:

2.03 tons of PE per year for P029 and P030, combined, as a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the particulate emission factor of 0.0078 pound of particulate emissions per gallon of paint concentrate produced by the maximum allowable amount of paint paste produced per year (520,316 gallons per year), and then dividing by 2000 pounds per ton.

d. Emission Limitation:

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

Applicable Compliance Method:

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

e. Emission Limitations:

0.000999 pound of VOC/OC per gallon of paint concentrate produced  
 0.000244 pound of individual HAP per gallon of paint concentrate produced

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0.000498 pound of combined HAPs per gallon of paint concentrate produced

Applicable Compliance Method:

The emission limitations are equivalent to the emission factors derived using equations from EIP Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Volume II, Chapter 8, Section 4, Revised Final August 2000, Updated March 14, 2002 and the "worst case" solvent mixture.

f. Emission Limitation:

0.0078 pound of PE per gallon of paint concentrate produced

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the particulate emission factor of 0.005 pound of particulate emissions per pound of pigment handled\* by the maximum hourly amount of pigment handled, then divided by the maximum gallons processed per hour.

\*AP-42 Table 6.4-1 Note (d) dated 5/83.

g. Emission Limitation:

0.26 ton of VOC/OC per year for P029 and P030, combined, as a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the EIP derived VOC/OC emission factor of 0.000999 pound of VOC/OC per gallon of paint concentrate produced by the maximum allowable amount of paint concentrate produced per year (520,316 gallons per year), and then dividing by 2000 pounds per ton.

h. Emission Limitation:

0.06 ton of individual HAP per year for P029 and P030, combined, as a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the EIP derived individual HAP

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Emissions Unit ID: P030

emission factor of 0.000244 pound of individual HAP per gallon of paint concentrate produced by the maximum allowable amount of paint concentrate produced per year (520,316 gallons per year), and then dividing by 2000 pounds per ton.

i. Emission Limitation:

0.30 ton of combined HAPs per year for P029 and P030, combined, as a rolling, 12-month summation

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Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the EIIP derived combined HAPs emission factor of 0.000498 pound of combined HAPs per gallon of paint concentrate produced by the maximum allowable amount of paint concentrate produced per year (530,316 gallons per year), and then dividing by 2000 pounds per ton.

**VI. Miscellaneous Requirements**

None

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Emissions Unit ID: P030

**Issued: To be entered upon final issuance**

**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>
P030 - Raw material handling, paint mixing tank, grinding, paint storage tank - Premixing Station Number 2.	None	See B.VI.1 below.

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary

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because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit

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to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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Emissions Unit ID: P031

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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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>
P031 - Paint mixing for 250 gallons or less container with medium speed mixers, one filler - Car Color Paint Mixing Station Number 7.	OAC rule 3745-31-05(A)(3)
	OAC rule 3745-31-05(C)

Emissions Unit ID: P031

	<u>Applicable Emissions Limitations/Control Measures</u>	summation
	0.54 pound of organic compounds (OC) per hour	0.21 ton of VOC per year for P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044), combined, as a rolling, 12-month summation
	0.11 pound of volatile organic compounds (VOC) per hour	
	0.6 pound of particulate emissions (PE) per hour	0.14 ton of individual HAP per year for P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044), combined, as a rolling, 12-month summation
	Visible particulate emissions from any stack shall not exceed ten percent opacity, as a six-minute average.	
OAC rule 3745-17-07(A)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C).	0.29 ton of combined HAPs per year for P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044), combined, as a rolling, 12-month summation
OAC rule 3745-17-11	0.00766 pound of OC per gallon of paint produced	
	0.00159 pound of VOC per gallon of paint produced	1.13 tons of PE per year for P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044), combined, as a rolling, 12-month summation
OAC rule 3745-21-07(G)(2)	0.00106 pound of individual hazardous air pollutant (HAP) per gallon of paint produced	
	0.0022 pound of combined hazardous air pollutants (HAPs) per gallon of paint produced	See A.II.1 below. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	0.0085 pound of PE per gallon of paint produced	
	1.02 tons of OC per year for P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044), combined, as a rolling, 12-month	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). The emission limitations specified by this rule are less stringent than the emission

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limitation established  
pursuant to OAC rule  
3745-31-05(A)(3).

**2. Additional Terms and Conditions**

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

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

**II. Operational Restrictions**

1. The maximum annual paint production rate for emissions units P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044) shall not exceed 265,338 gallons, 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 paint production levels specified in the following table:

<u>Month</u>	<u>Maximum Allowable Cumulative Paint Production</u>
1	22,112 gallons
1-2	44,223 gallons
1-3	66,335 gallons
1-4	88,446 gallons
1-5	110,558 gallons
1-6	132,669 gallons
1-7	154,781 gallons
1-8	176,892 gallons
1-9	199,004 gallons
1-10	221,115 gallons
1-11	243,227 gallons
1-12	265,338 gallons

Emissions Unit ID: P031

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

### III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for emissions units P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044) combined:
  - a. the paint production 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 concentrate production rates.

Also, during the first 12 calendar months of operation following this issuance of this permit, the permittee shall record the cumulative paint concentrate production rate for each calendar month.

2. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack(s) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to eliminate the visible emissions.

### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month paint production rate limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative paint production levels.
2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack(s) serving this emissions unit and (b)

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describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

3. The deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part 1 - 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:

0.54 pound of OC per hour

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the EHIP derived OC emission factor of 0.00766 pound of OC per gallon of paint produced by the maximum hourly production rate.

- b. Emission Limitation:

0.11 pound of VOC per hour

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the EHIP derived VOC emission factor of 0.00159 pound of VOC per gallon of paint produced by the maximum hourly production rate.

- c. Emission Limitation:

0.6 pound of PE per hour

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the particulate emission factor of 0.005 pound of PE per pound of pigment handled\* by the maximum hourly amount of pigment handled. Stack testing may be required in the future in

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accordance with the test method(s) and procedures in OAC rule 3745-17-03(B)(10).

\*AP-42 Chapter 6.4 under 6.4.2 states particulate emissions amount to 0.5 - 1.0% of pigment handled. Used 0.5% because emissions unit is located inside the building.

**Issued: To be entered upon final issuance**d. Emission Limitation:

1.13 tons of PE per year for P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044), combined, as a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the particulate emission factor of 0.0085 pound of particulate emissions per gallon of paint produced by the maximum allowable amount of paint produced per year (265,338 gallons per year), and then dividing by 2000 pounds per ton.

e. Emission Limitation:

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

Applicable Compliance Method:

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

f. Emission Limitations:

0.00766 pound of OC per gallon of paint produced  
0.00159 pound of VOC per gallon of paint produced  
0.00106 pound of individual HAP per gallon of paint produced  
0.0022 pound of combined HAP per gallon of paint produced

Applicable Compliance Method:

The emission limitations are equivalent to the emission factors derived using equations from EIIP Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Volume II, Chapter 8, Section 4, Revised Final August 2000, Updated March 14, 2002 and the "worst case" solvent mixture.

g. Emission Limitation:

0.0085 pound of PE per gallon of paint produced

Applicable Compliance Method:

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Emissions Unit ID: P031

Compliance shall be demonstrated by multiplying the particulate emission factor of 0.005 pound of particulate emissions per pound of pigment handled\* by the maximum hourly

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amount of pigment handled, then divided by the maximum gallons processed per hour.

\*AP-42 Table 6.4-1 Note (d) dated 5/83.

h. Emission Limitation:

1.02 tons of OC per year for P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044), combined, as a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the EIIP derived OC emission factor of 0.00766 pound of OC per gallon of paint produced by the maximum allowable amount of paint produced per year (265,338 gallons per year), and then dividing by 2000 pounds per ton.

i. Emission Limitation:

0.21 ton of VOC per year for P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044), combined, as a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the EIIP derived VOC emission factor of 0.00159 pound of VOC per gallon of paint produced by the maximum allowable amount of paint produced per year (265,338 gallons per year), and then dividing by 2000 pounds per ton.

j. Emission Limitation:

0.14 ton of individual HAP per year for P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044), combined, as a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the EIIP derived individual HAP emission factor of 0.00106 pound of individual HAP per gallon of paint produced by the maximum allowable amount of paint produced per year (265,338 gallons per year), and

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then dividing by 2000 pounds per ton.

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k. Emission Limitation:

0.29 ton of combined HAPs per year for P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044), combined, as a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the EIIP derived combined HAPs emission factor of 0.0022 pound of combined HAPs per gallon of paint produced by the maximum allowable amount of paint produced per year (265,338 gallons per year), and then dividing by 2000 pounds per ton.

**VI. Miscellaneous Requirements**

None

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**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>
P031 - Paint mixing for 250 gallons or less container with medium speed mixers, one filler - Car Color Paint Mixing Station Number 7.	None	See B.VI.1 below.

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

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Emissions Unit ID: P031

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit

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to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>
P032 - Paint mixing for 250 gallons or less container with medium speed mixers, one filler - Car Color Paint Mixing Station Number 8.	OAC rule 3745-31-05(A)(3)
	OAC rule 3745-31-05(C)

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	Applicable Emissions Limitations/Control Measures	(P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044), combined, as a rolling, 12-month summation
	0.54 pound of organic compounds (OC) per hour	0.21 ton of VOC per year for P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044), combined, as a rolling, 12-month summation
	0.11 pound of volatile organic compounds (VOC) per hour	
	0.6 pound of particulate emissions (PE) per hour	0.14 ton of individual HAP per year for P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044), combined, as a rolling, 12-month summation
OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed ten percent opacity, as a six-minute average.  The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C).	0.29 ton of combined HAPs per year for P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044), combined, as a rolling, 12-month summation
OAC rule 3745-17-11	0.00766 pound of OC per gallon of paint produced	0.29 ton of combined HAPs per year for P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044), combined, as a rolling, 12-month summation
	0.00159 pound of VOC per gallon of paint produced	1.13 tons of PE per year for P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044), combined, as a rolling, 12-month summation
OAC rule 3745-21-07(G)(2)	0.00106 pound of individual hazardous air pollutant (HAP) per gallon of paint produced	See A.II.1 below.
	0.0022 pound of combined hazardous air pollutants (HAPs) per gallon of paint produced	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	0.0085 pound of PE per gallon of paint produced	
	1.02 tons of OC per year for P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045	The emission limitation specified by this rule is less stringent than the emission

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**PTI Application: 16-02224**  
**Issued**

**Facility ID: 1652050060**

Emissions Unit ID: P032

limitation established pursuant to OAC rule 3745-31-05(A)(3).

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

## 2. Additional Terms and Conditions

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

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

## II. Operational Restrictions

1. The maximum annual paint production rate for emissions units P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044) shall not exceed 265,338 gallons, 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 paint production levels specified in the following table:

<u>Month</u>	<u>Maximum Allowable Cumulative Paint Production</u>
1	22,112 gallons
1-2	44,223 gallons
1-3	66,335 gallons
1-4	88,446 gallons
1-5	110,558 gallons
1-6	132,669 gallons
1-7	154,781 gallons
1-8	176,892 gallons
1-9	199,004 gallons
1-10	221,115 gallons

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1-11	243,227 gallons
1-12	265,338 gallons

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

**III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall maintain monthly records of the following information for emissions units P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044) combined:
  - a. the paint production 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 concentrate production rates.

Also, during the first 12 calendar months of operation following this issuance of this permit, the permittee shall record the cumulative paint concentrate production rate for each calendar month.

2. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack(s) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to eliminate the visible emissions.

**IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of

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the rolling, 12-month paint production rate limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative paint production levels.

2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack(s) serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.
3. The deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part 1 - 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:  
  
0.54 pound of OC per hour  
  
Applicable Compliance Method:  
  
Compliance shall be demonstrated by multiplying the EIIP derived OC emission factor of 0.00766 pound of OC per gallon of paint produced by the maximum hourly production rate.
  - b. Emission Limitation:  
  
0.11 pound of VOC per hour  
  
Applicable Compliance Method:  
  
Compliance shall be demonstrated by multiplying the EIIP derived VOC emission factor of 0.00159 pound of VOC per gallon of paint produced by the maximum hourly production rate.
  - c. Emission Limitation:  
  
0.6 pound of PE per hour

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**Facility ID: 1652050060**

Emissions Unit ID: P032

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the particulate emission factor of 0.005 pound of PE per pound of pigment handled\* by the maximum hourly amount of pigment handled. Stack testing may be required in the future in accordance with the test method(s) and procedures in OAC rule 3745-17-03(B)(10).

\*AP-42 Chapter 6.4 under 6.4.2 states particulate emissions amount to 0.5 - 1.0% of pigment handled. Used 0.5% because emissions unit is located inside the building.

**Issued: To be entered upon final issuance**d. Emission Limitation:

1.13 tons of PE per year for P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044), combined, as a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the particulate emission factor of 0.0085 pound of particulate emissions per gallon of paint produced by the maximum allowable amount of paint produced per year (265,338 gallons per year), and then dividing by 2000 pounds per ton.

e. Emission Limitation:

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

Applicable Compliance Method:

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

f. Emission Limitations:

0.00766 pound of OC per gallon of paint produced  
0.00159 pound of VOC per gallon of paint produced  
0.00106 pound of individual HAP per gallon of paint produced  
0.0022 pound of combined HAP per gallon of paint produced

Applicable Compliance Method:

The emission limitations are equivalent to the emission factors derived using equations from EIIP Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Volume II, Chapter 8, Section 4, Revised Final August 2000, Updated March 14, 2002 and the "worst case" solvent mixture.

g. Emission Limitation:

0.0085 pound of PE per gallon of paint produced

Applicable Compliance Method:

**Issued: To be entered upon final issuance**

Compliance shall be demonstrated by multiplying the particulate emission factor of 0.005 pound of particulate emissions per pound of pigment handled\* by the maximum hourly amount of pigment handled, then divided by the maximum gallons processed per hour.

\*AP-42 Table 6.4-1 Note (d) dated 5/83.

h. Emission Limitation:

1.02 tons of OC per year for P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044), combined, as a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the EIIP derived OC emission factor of 0.00766 pound of OC per gallon of paint produced by the maximum allowable amount of paint produced per year (265,338 gallons per year), and then dividing by 2000 pounds per ton.

i. Emission Limitation:

0.21 ton of VOC per year for P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044), combined, as a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the EIIP derived VOC emission factor of 0.00159 pound of VOC per gallon of paint produced by the maximum allowable amount of paint produced per year (265,338 gallons per year), and then dividing by 2000 pounds per ton.

j. Emission Limitation:

0.14 ton of individual HAP per year for P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044), combined, as a rolling, 12-month summation

Applicable Compliance Method:

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Emissions Unit ID: P032

Compliance shall be demonstrated by multiplying the EIP derived individual HAP emission factor of 0.00106 pound of individual HAP per gallon of paint produced by the maximum allowable amount of paint produced per year (265,338 gallons per year), and then dividing by 2000 pounds per ton.

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k. Emission Limitation:

0.29 ton of combined HAPs per year for P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044), combined, as a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the EIIP derived combined HAPs emission factor of 0.0022 pound of combined HAPs per gallon of paint produced by the maximum allowable amount of paint produced per year (265,338 gallons per year), and then dividing by 2000 pounds per ton.

**VI. Miscellaneous Requirements**

None

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**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>
P032 - Paint mixing for 250 gallons or less container with medium speed mixers, one filler - Car Color Paint Mixing Station Number 8.	None	See B.VI.1 below.

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

**Issued: To be entered upon final issuance**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit

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to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>
P033 - Paint mixing for 250 gallons or less container with medium speed mixers, one filler - Car Color Paint Mixing Station Number 9.	OAC rule 3745-31-05(A)(3)
	OAC rule 3745-31-05(C)

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	Applicable Emissions <u>Limitations/Control Measures</u>	
		(P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044), combined, as a rolling, 12-month summation
	0.54 pound of organic compounds (OC) per hour	0.21 ton of VOC per year for P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044), combined, as a rolling, 12-month summation
	0.11 pound of volatile organic compounds (VOC) per hour	
	0.6 pound of particulate emissions (PE) per hour	0.14 ton of individual HAP per year for P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044), combined, as a rolling, 12-month summation
	Visible particulate emissions from any stack shall not exceed ten percent opacity, as a six-minute average.	
OAC rule 3745-17-07(A)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C).	0.29 ton of combined HAPs per year for P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044), combined, as a rolling, 12-month summation
OAC rule 3745-17-11	0.00766 pound of OC per gallon of paint produced	
	0.00159 pound of VOC per gallon of paint produced	1.13 tons of PE per year for P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044), combined, as a rolling, 12-month summation
OAC rule 3745-21-07(G)(2)	0.00106 pound of individual hazardous air pollutant (HAP) per gallon of paint produced	
	0.0022 pound of combined hazardous air pollutants (HAPs) per gallon of paint produced	See A.II.1 below.
	0.0085 pound of PE per gallon of paint produced	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	1.02 tons of OC per year for P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045	The emission limitation specified by this rule is less stringent than the emission

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**Facility ID: 1652050060**

Emissions Unit ID: P033

limitation established pursuant to OAC rule 3745-31-05(A)(3).

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

## 2. Additional Terms and Conditions

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

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

## II. Operational Restrictions

1. The maximum annual paint production rate for emissions units P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044) shall not exceed 265,338 gallons, 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 paint production levels specified in the following table:

<u>Month</u>	<u>Maximum Allowable Cumulative Paint Production</u>
1	22,112 gallons
1-2	44,223 gallons
1-3	66,335 gallons
1-4	88,446 gallons
1-5	110,558 gallons
1-6	132,669 gallons
1-7	154,781 gallons
1-8	176,892 gallons
1-9	199,004 gallons
1-10	221,115 gallons

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1-11	243,227 gallons
1-12	265,338 gallons

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

**III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall maintain monthly records of the following information for emissions units P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044) combined:
  - a. the paint production 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 concentrate production rates.

Also, during the first 12 calendar months of operation following this issuance of this permit, the permittee shall record the cumulative paint concentrate production rate for each calendar month.

2. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack(s) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to eliminate the visible emissions.

**IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of

Emissions Unit ID: P033

the rolling, 12-month paint production rate limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative paint production levels.

2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack(s) serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.
3. The deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part 1 - 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:  
  
0.54 pound of OC per hour  
  
Applicable Compliance Method:  
  
Compliance shall be demonstrated by multiplying the EIIP derived OC emission factor of 0.00766 pound of OC per gallon of paint produced by the maximum hourly production rate.
  - b. Emission Limitation:  
  
0.11 pound of VOC per hour  
  
Applicable Compliance Method:  
  
Compliance shall be demonstrated by multiplying the EIIP derived VOC emission factor of 0.00159 pound of VOC per gallon of paint produced by the maximum hourly production rate.
  - c. Emission Limitation:  
  
0.6 pound of PE per hour  
  
Applicable Compliance Method:

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Compliance shall be demonstrated by multiplying the particulate emission factor of 0.005 pound of PE per pound of pigment handled\* by the maximum hourly amount of pigment handled. Stack testing may be required in the future in accordance with the test method(s) and procedures in OAC rule 3745-17-03(B)(10).

\*AP-42 Chapter 6.4 under 6.4.2 states particulate emissions amount to 0.5 - 1.0% of pigment handled. Used 0.5% because emissions unit is located inside the building.

**Issued: To be entered upon final issuance**d. Emission Limitation:

1.13 tons of PE per year for P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044), combined, as a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the particulate emission factor of 0.0085 pound of particulate emissions per gallon of paint produced by the maximum allowable amount of paint produced per year (265,338 gallons per year), and then dividing by 2000 pounds per ton.

e. Emission Limitation:

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

Applicable Compliance Method:

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

f. Emission Limitations:

0.00766 pound of OC per gallon of paint produced  
0.00159 pound of VOC per gallon of paint produced  
0.00106 pound of individual HAP per gallon of paint produced  
0.0022 pound of combined HAP per gallon of paint produced

Applicable Compliance Method:

The emission limitations are equivalent to the emission factors derived using equations from EIIP Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Volume II, Chapter 8, Section 4, Revised Final August 2000, Updated March 14, 2002 and the "worst case" solvent mixture.

g. Emission Limitation:

0.0085 pound of PE per gallon of paint produced

Applicable Compliance Method:

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Compliance shall be demonstrated by multiplying the particulate emission factor of 0.005 pound of particulate emissions per pound of pigment handled\* by the maximum hourly amount of pigment handled, then divided by the maximum gallons processed per hour.

\*AP-42 Table 6.4-1 Note (d) dated 5/83.

h. Emission Limitation:

1.02 tons of OC per year for P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044), combined, as a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the EIIP derived OC emission factor of 0.00766 pound of OC per gallon of paint produced by the maximum allowable amount of paint produced per year (265,338 gallons per year), and then dividing by 2000 pounds per ton.

i. Emission Limitation:

0.21 ton of VOC per year for P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044), combined, as a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the EIIP derived VOC emission factor of 0.00159 pound of VOC per gallon of paint produced by the maximum allowable amount of paint produced per year (265,338 gallons per year), and then dividing by 2000 pounds per ton.

j. Emission Limitation:

0.14 ton of individual HAP per year for P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044), combined, as a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the EIIP derived individual HAP emission factor of 0.00106 pound of individual HAP per gallon of paint produced by the maximum allowable amount of paint produced per year (265,338 gallons per year), and

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then dividing by 2000 pounds per ton.

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k. Emission Limitation:

0.29 ton of combined HAPs per year for P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044), combined, as a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the EIIP derived combined HAPs emission factor of 0.0022 pound of combined HAPs per gallon of paint produced by the maximum allowable amount of paint produced per year (265,338 gallons per year), and then dividing by 2000 pounds per ton.

**VI. Miscellaneous Requirements**

None

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**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>
P033 - Paint mixing for 250 gallons or less container with medium speed mixers, one filler - Car Color Paint Mixing Station Number 9.	None	See B.VI.1 below.

**2. Additional Terms and Conditions**

- 2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

**Issued: To be entered upon final issuance**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit

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Emissions Unit ID: P033

to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>
P034 - Paint mixing for 250 gallons or less container with medium speed mixers, one filler - Car Color Paint Mixing Station Number 10.	OAC rule 3745-31-05(A)(3)
	OAC rule 3745-31-05(C)

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	Applicable Emissions <u>Limitations/Control Measures</u>	(P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044), combined, as a rolling, 12-month summation
OAC rule 3745-17-07(A)	0.54 pound of organic compounds (OC) per hour	0.21 ton of VOC per year for P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044), combined, as a rolling, 12-month summation
	0.11 pound of volatile organic compounds (VOC) per hour	
	0.6 pound of particulate emissions (PE) per hour	
OAC rule 3745-17-11	Visible particulate emissions from any stack shall not exceed ten percent opacity, as a six-minute average.	0.14 ton of individual HAP per year for P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044), combined, as a rolling, 12-month summation
	The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C).	
OAC rule 3745-21-07(G)(2)	0.00766 pound of OC per gallon of paint produced	0.29 ton of combined HAPs per year for P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044), combined, as a rolling, 12-month summation
	0.00159 pound of VOC per gallon of paint produced	
	0.00106 pound of individual hazardous air pollutant (HAP) per gallon of paint produced	1.13 tons of PE per year for P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044), combined, as a rolling, 12-month summation
	0.0022 pound of combined hazardous air pollutants (HAPs) per gallon of paint produced	See A.II.1 below.
	0.0085 pound of PE per gallon of paint produced	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	1.02 tons of OC per year for P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045	The emission limitation specified by this rule is less stringent than the emission

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limitation established pursuant to OAC rule 3745-31-05(A)(3).

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

**2. Additional Terms and Conditions**

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

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

**II. Operational Restrictions**

1. The maximum annual paint production rate for emissions units P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044) shall not exceed 265,338 gallons, 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 paint production levels specified in the following table:

<u>Month</u>	<u>Maximum Allowable Cumulative Paint Production</u>
1	22,112 gallons
1-2	44,223 gallons
1-3	66,335 gallons
1-4	88,446 gallons
1-5	110,558 gallons
1-6	132,669 gallons

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**Facility ID: 1652050060**

Emissions Unit ID: P034

1-7	154,781 gallons
1-8	176,892 gallons
1-9	199,004 gallons
1-10	221,115 gallons
1-11	243,227 gallons
1-12	265,338 gallons

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

### **III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall maintain monthly records of the following information for emissions units P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044) combined:
  - a. the paint production 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 concentrate production rates.

Also, during the first 12 calendar months of operation following this issuance of this permit, the permittee shall record the cumulative paint concentrate production rate for each calendar month.

2. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack(s) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to eliminate the visible emissions.

### **IV. Reporting Requirements**

**Issued: To be entered upon final issuance**

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month paint production rate limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative paint production levels.
2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack(s) serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.
3. The deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part 1 - 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:  
  
0.54 pound of OC per hour  
  
Applicable Compliance Method:  
  
Compliance shall be demonstrated by multiplying the EIIP derived OC emission factor of 0.00766 pound of OC per gallon of paint produced by the maximum hourly production rate.
  - b. Emission Limitation:  
  
0.11 pound of VOC per hour  
  
Applicable Compliance Method:  
  
Compliance shall be demonstrated by multiplying the EIIP derived VOC emission factor of 0.00159 pound of VOC per gallon of paint produced by the maximum hourly production rate.
  - c. Emission Limitation:

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0.6 pound of PE per hour

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the particulate emission factor of 0.005 pound of PE per pound of pigment handled\* by the maximum hourly amount of pigment handled. Stack testing may be required in the future in accordance with the test method(s) and procedures in OAC rule 3745-17-03(B)(10).

\*AP-42 Chapter 6.4 under 6.4.2 states particulate emissions amount to 0.5 - 1.0% of pigment handled. Used 0.5% because emissions unit is located inside the building.

**Issued: To be entered upon final issuance**d. Emission Limitation:

1.13 tons of PE per year for P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044), combined, as a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the particulate emission factor of 0.0085 pound of particulate emissions per gallon of paint produced by the maximum allowable amount of paint produced per year (265,338 gallons per year), and then dividing by 2000 pounds per ton.

e. Emission Limitation:

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

Applicable Compliance Method:

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

f. Emission Limitations:

0.00766 pound of OC per gallon of paint produced  
0.00159 pound of VOC per gallon of paint produced  
0.00106 pound of individual HAP per gallon of paint produced  
0.0022 pound of combined HAP per gallon of paint produced

Applicable Compliance Method:

The emission limitations are equivalent to the emission factors derived using equations from EIIP Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Volume II, Chapter 8, Section 4, Revised Final August 2000, Updated March 14, 2002 and the "worst case" solvent mixture.

g. Emission Limitation:

0.0085 pound of PE per gallon of paint produced

Applicable Compliance Method:

**Issued: To be entered upon final issuance**

Compliance shall be demonstrated by multiplying the particulate emission factor of 0.005 pound of particulate emissions per pound of pigment handled\* by the maximum hourly amount of pigment handled, then divided by the maximum gallons processed per hour.

\*AP-42 Table 6.4-1 Note (d) dated 5/83.

h. Emission Limitation:

1.02 tons of OC per year for P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044), combined, as a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the EIIP derived OC emission factor of 0.00766 pound of OC per gallon of paint produced by the maximum allowable amount of paint produced per year (265,338 gallons per year), and then dividing by 2000 pounds per ton.

i. Emission Limitation:

0.21 ton of VOC per year for P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044), combined, as a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the EIIP derived VOC emission factor of 0.00159 pound of VOC per gallon of paint produced by the maximum allowable amount of paint produced per year (265,338 gallons per year), and then dividing by 2000 pounds per ton.

j. Emission Limitation:

0.14 ton of individual HAP per year for P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044), combined, as a rolling, 12-month summation

Applicable Compliance Method:

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Compliance shall be demonstrated by multiplying the EIP derived individual HAP emission factor of 0.00106 pound of individual HAP per gallon of paint produced by the maximum allowable amount of paint produced per year (265,338 gallons per year), and then dividing by 2000 pounds per ton.

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Emissions Unit ID: P034

**Issued: To be entered upon final issuance**

k. Emission Limitation:

0.29 ton of combined HAPs per year for P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044), combined, as a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the EIIP derived combined HAPs emission factor of 0.0022 pound of combined HAPs per gallon of paint produced by the maximum allowable amount of paint produced per year (265,338 gallons per year), and then dividing by 2000 pounds per 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P034 - Paint mixing for 250 gallons or less container with medium speed mixers, one filler - Car Color Paint Mixing Station Number 10.	None	See B.VI.1 below.

**2. Additional Terms and Conditions**

- 2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit

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**Issued: To be entered upon final issuance**

to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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Issued: To be entered upon final issuance

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>
P035 - Paint mixing for 250 gallons or less container with medium speed mixers, one filler - Car Color Paint Mixing Station Number 11.	OAC rule 3745-31-05(A)(3)
	OAC rule 3745-31-05(C)

**Issued: To be entered upon final issuance**

	Applicable Emissions Limitations/Control Measures	(P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044), combined, as a rolling, 12-month summation
	0.54 pound of organic compounds (OC) per hour	0.21 ton of VOC per year for P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044), combined, as a rolling, 12-month summation
	0.11 pound of volatile organic compounds (VOC) per hour	
	0.6 pound of particulate emissions (PE) per hour	0.14 ton of individual HAP per year for P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044), combined, as a rolling, 12-month summation
OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed ten percent opacity, as a six-minute average.	
	The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C).	0.29 ton of combined HAPs per year for P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044), combined, as a rolling, 12-month summation
OAC rule 3745-17-11	0.00766 pound of OC per gallon of paint produced	
	0.00159 pound of VOC per gallon of paint produced	1.13 tons of PE per year for P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044), combined, as a rolling, 12-month summation
OAC rule 3745-21-07(G)(2)	0.00106 pound of individual hazardous air pollutant (HAP) per gallon of paint produced	
	0.0022 pound of combined hazardous air pollutants (HAPs) per gallon of paint produced	See A.II.1 below.
	0.0085 pound of PE per gallon of paint produced	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	1.02 tons of OC per year for P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045	The emission limitation specified by this rule is less stringent than the emission

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Emissions Unit ID: P035

limitation established pursuant to OAC rule 3745-31-05(A)(3).

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

## **2. Additional Terms and Conditions**

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

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

## **II. Operational Restrictions**

1. The maximum annual paint production rate for emissions units P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044) shall not exceed 265,338 gallons, 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 paint production levels specified in the following table:

<u>Month</u>	<u>Maximum Allowable Cumulative Paint Production</u>
1	22,112 gallons
1-2	44,223 gallons
1-3	66,335 gallons
1-4	88,446 gallons
1-5	110,558 gallons
1-6	132,669 gallons
1-7	154,781 gallons
1-8	176,892 gallons
1-9	199,004 gallons
1-10	221,115 gallons

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1-11	243,227 gallons
1-12	265,338 gallons

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

**III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall maintain monthly records of the following information for emissions units P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044) combined:
  - a. the paint production 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 concentrate production rates.

Also, during the first 12 calendar months of operation following this issuance of this permit, the permittee shall record the cumulative paint concentrate production rate for each calendar month.

2. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack(s) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to eliminate the visible emissions.

**IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of

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the rolling, 12-month paint production rate limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative paint production levels.

2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack(s) serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.
3. The deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part 1 - 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:

0.54 pound of OC per hour

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the EIIP derived OC emission factor of 0.00766 pound of OC per gallon of paint produced by the maximum hourly production rate.

- b. Emission Limitation:

0.11 pound of VOC per hour

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the EIIP derived VOC emission factor of 0.00159 pound of VOC per gallon of paint produced by the maximum hourly production rate.

- c. Emission Limitation:

0.6 pound of PE per hour

Applicable Compliance Method:

**Issued: To be entered upon final issuance**

Compliance shall be demonstrated by multiplying the particulate emission factor of 0.005 pound of PE per pound of pigment handled\* by the maximum hourly amount of pigment handled. Stack testing may be required in the future in accordance with the test method(s) and procedures in OAC rule 3745-17-03(B)(10).

\*AP-42 Chapter 6.4 under 6.4.2 states particulate emissions amount to 0.5 - 1.0% of pigment handled. Used 0.5% because emissions unit is located inside the building.

**Issued: To be entered upon final issuance**d. Emission Limitation:

1.13 tons of PE per year for P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044), combined, as a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the particulate emission factor of 0.0085 pound of particulate emissions per gallon of paint produced by the maximum allowable amount of paint produced per year (265,338 gallons per year), and then dividing by 2000 pounds per ton.

e. Emission Limitation:

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

Applicable Compliance Method:

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

f. Emission Limitations:

0.00766 pound of OC per gallon of paint produced  
0.00159 pound of VOC per gallon of paint produced  
0.00106 pound of individual HAP per gallon of paint produced  
0.0022 pound of combined HAP per gallon of paint produced

Applicable Compliance Method:

The emission limitations are equivalent to the emission factors derived using equations from EIIP Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Volume II, Chapter 8, Section 4, Revised Final August 2000, Updated March 14, 2002 and the "worst case" solvent mixture.

g. Emission Limitation:

0.0085 pound of PE per gallon of paint produced

Applicable Compliance Method:

**Issued: To be entered upon final issuance**

Compliance shall be demonstrated by multiplying the particulate emission factor of 0.005 pound of particulate emissions per pound of pigment handled\* by the maximum hourly amount of pigment handled, then divided by the maximum gallons processed per hour.

\*AP-42 Table 6.4-1 Note (d) dated 5/83.

h. Emission Limitation:

1.02 tons of OC per year for P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044), combined, as a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the EIIP derived OC emission factor of 0.00766 pound of OC per gallon of paint produced by the maximum allowable amount of paint produced per year (265,338 gallons per year), and then dividing by 2000 pounds per ton.

i. Emission Limitation:

0.21 ton of VOC per year for P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044), combined, as a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the EIIP derived VOC emission factor of 0.00159 pound of VOC per gallon of paint produced by the maximum allowable amount of paint produced per year (265,338 gallons per year), and then dividing by 2000 pounds per ton.

j. Emission Limitation:

0.14 ton of individual HAP per year for P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044), combined, as a rolling, 12-month summation

Applicable Compliance Method:

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Compliance shall be demonstrated by multiplying the EIP derived individual HAP emission factor of 0.00106 pound of individual HAP per gallon of paint produced by the maximum allowable amount of paint produced per year (265,338 gallons per year), and then dividing by 2000 pounds per ton.

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k. Emission Limitation:

0.29 ton of combined HAPs per year for P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044), combined, as a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the EIIP derived combined HAPs emission factor of 0.0022 pound of combined HAPs per gallon of paint produced by the maximum allowable amount of paint produced per year (265,338 gallons per year), and then dividing by 2000 pounds per ton.

**VI. Miscellaneous Requirements**

None

**Issued: To be entered upon final issuance**

**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>
P035 - Paint mixing for 250 gallons or less container with medium speed mixers, one filler - Car Color Paint Mixing Station Number 11.	None	See B.VI.1 below.

**2. Additional Terms and Conditions**

- 2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

**Issued: To be entered upon final issuance**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit

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**Issued: To be entered upon final issuance**

to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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Emissions Unit ID: P036

Issued: To be entered upon final issuance

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>
P036 - Paint mixing for 250 gallons or less container with medium speed mixers, one filler - Car Color Paint Mixing Station Number 12.	OAC rule 3745-31-05(A)(3)
	OAC rule 3745-31-05(C)

Emissions Unit ID: P036

	Applicable Emissions Limitations/Control Measures	summation
	0.54 pound of organic compounds (OC) per hour	0.21 ton of VOC per year for P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044), combined, as a rolling, 12-month summation
	0.11 pound of volatile organic compounds (VOC) per hour	
	0.6 pound of particulate emissions (PE) per hour	0.14 ton of individual HAP per year for P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044), combined, as a rolling, 12-month summation
OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed ten percent opacity, as a six-minute average.	
	The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C).	0.29 ton of combined HAPs per year for P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044), combined, as a rolling, 12-month summation
OAC rule 3745-17-11	0.00766 pound of OC per gallon of paint produced	
	0.00159 pound of VOC per gallon of paint produced	1.13 tons of PE per year for P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044), combined, as a rolling, 12-month summation
OAC rule 3745-21-07(G)(2)	0.00106 pound of individual hazardous air pollutant (HAP) per gallon of paint produced	See A.II.1 below.
	0.0022 pound of combined hazardous air pollutants (HAPs) per gallon of paint produced	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	0.0085 pound of PE per gallon of paint produced	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	1.02 tons of OC per year for P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044), combined, as a rolling, 12-month	The emission limitations specified by this rule are less stringent than the emission

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**Issued: To be entered upon final issuance**

limitation established pursuant to OAC rule 3745-31-05(A)(3).

**2. Additional Terms and Conditions**

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

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

**II. Operational Restrictions**

1. The maximum annual paint production rate for emissions units P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044) shall not exceed 265,338 gallons, 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 paint production levels specified in the following table:

<u>Month</u>	<u>Maximum Allowable Cumulative Paint Production</u>
1	22,112 gallons
1-2	44,223 gallons
1-3	66,335 gallons
1-4	88,446 gallons
1-5	110,558 gallons
1-6	132,669 gallons
1-7	154,781 gallons
1-8	176,892 gallons
1-9	199,004 gallons
1-10	221,115 gallons
1-11	243,227 gallons
1-12	265,338 gallons

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

### **III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall maintain monthly records of the following information for emissions units P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044) combined:
  - a. the paint production 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 concentrate production rates.

Also, during the first 12 calendar months of operation following this issuance of this permit, the permittee shall record the cumulative paint concentrate production rate for each calendar month.

2. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack(s) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to eliminate the visible emissions.

### **IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month paint production rate limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative paint production levels.
2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack(s) serving this emissions unit and (b)

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describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

3. The deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part 1 - 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:

0.54 pound of OC per hour

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the EHIP derived OC emission factor of 0.00766 pound of OC per gallon of paint produced by the maximum hourly production rate.

- b. Emission Limitation:

0.11 pound of VOC per hour

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the EHIP derived VOC emission factor of 0.00159 pound of VOC per gallon of paint produced by the maximum hourly production rate.

- c. Emission Limitation:

0.6 pound of PE per hour

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the particulate emission factor of 0.005 pound of PE per pound of pigment handled\* by the maximum hourly amount of pigment handled. Stack testing may be required in the future in

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accordance with the test method(s) and procedures in OAC rule 3745-17-03(B)(10).

\*AP-42 Chapter 6.4 under 6.4.2 states particulate emissions amount to 0.5 - 1.0% of pigment handled. Used 0.5% because emissions unit is located inside the building.

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d. Emission Limitation:

1.13 tons of PE per year for P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044), combined, as a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the particulate emission factor of 0.0085 pound of particulate emissions per gallon of paint produced by the maximum allowable amount of paint produced per year (265,338 gallons per year), and then dividing by 2000 pounds per ton.

e. Emission Limitation:

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

Applicable Compliance Method:

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

f. Emission Limitations:

0.00766 pound of OC per gallon of paint produced  
0.00159 pound of VOC per gallon of paint produced  
0.00106 pound of individual HAP per gallon of paint produced  
0.0022 pound of combined HAP per gallon of paint produced

Applicable Compliance Method:

The emission limitations are equivalent to the emission factors derived using equations from EIIP Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Volume II, Chapter 8, Section 4, Revised Final August 2000, Updated March 14, 2002 and the "worst case" solvent mixture.

g. Emission Limitation:

0.0085 pound of PE per gallon of paint produced

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the particulate emission factor of 0.005 pound of particulate emissions per pound of pigment handled\* by the maximum hourly

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amount of pigment handled, then divided by the maximum gallons processed per hour.

\*AP-42 Table 6.4-1 Note (d) dated 5/83.

h. Emission Limitation:

1.02 tons of OC per year for P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044), combined, as a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the EIIP derived OC emission factor of 0.00766 pound of OC per gallon of paint produced by the maximum allowable amount of paint produced per year (265,338 gallons per year), and then dividing by 2000 pounds per ton.

i. Emission Limitation:

0.21 ton of VOC per year for P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044), combined, as a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the EIIP derived VOC emission factor of 0.00159 pound of VOC per gallon of paint produced by the maximum allowable amount of paint produced per year (265,338 gallons per year), and then dividing by 2000 pounds per ton.

j. Emission Limitation:

0.14 ton of individual HAP per year for P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044), combined, as a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the EIIP derived individual HAP emission factor of 0.00106 pound of individual HAP per gallon of paint produced by the maximum allowable amount of paint produced per year (265,338 gallons per year), and

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then dividing by 2000 pounds per ton.

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k. Emission Limitation:

0.29 ton of combined HAPs per year for P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044), combined, as a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the EIIP derived combined HAPs emission factor of 0.0022 pound of combined HAPs per gallon of paint produced by the maximum allowable amount of paint produced per year (265,338 gallons per year), and then dividing by 2000 pounds per 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P036 - Paint mixing for 250 gallons or less container with medium speed mixers, one filler - Car Color Paint Mixing Station Number 12.	None	See B.VI.1 below.

**2. Additional Terms and Conditions**

- 2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit

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to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>
P037 - Paint mixing for 250 gallons or less container with medium speed mixers, one filler - Car Color Paint Mixing Station Number 13.	OAC rule 3745-31-05(A)(3)
	OAC rule 3745-31-05(C)

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	Applicable Emissions Limitations/Control Measures	(P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044), combined, as a rolling, 12-month summation
	0.54 pound of organic compounds (OC) per hour	0.21 ton of VOC per year for P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044), combined, as a rolling, 12-month summation
	0.11 pound of volatile organic compounds (VOC) per hour	
	0.6 pound of particulate emissions (PE) per hour	0.14 ton of individual HAP per year for P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044), combined, as a rolling, 12-month summation
OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed ten percent opacity, as a six-minute average.	
	The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C).	0.29 ton of combined HAPs per year for P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044), combined, as a rolling, 12-month summation
OAC rule 3745-17-11	0.00766 pound of OC per gallon of paint produced	
	0.00159 pound of VOC per gallon of paint produced	1.13 tons of PE per year for P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044), combined, as a rolling, 12-month summation
OAC rule 3745-21-07(G)(2)	0.00106 pound of individual hazardous air pollutant (HAP) per gallon of paint produced	See A.II.1 below.
	0.0022 pound of combined hazardous air pollutants (HAPs) per gallon of paint produced	
	0.0085 pound of PE per gallon of paint produced	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	1.02 tons of OC per year for P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045	The emission limitation specified by this rule is less stringent than the emission

limitation established pursuant to OAC rule 3745-31-05(A)(3).

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

**2. Additional Terms and Conditions**

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

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

**II. Operational Restrictions**

1. The maximum annual paint production rate for emissions units P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044) shall not exceed 265,338 gallons, 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 paint production levels specified in the following table:

<u>Month</u>	<u>Maximum Allowable Cumulative Paint Production</u>
1	22,112 gallons
1-2	44,223 gallons
1-3	66,335 gallons
1-4	88,446 gallons
1-5	110,558 gallons
1-6	132,669 gallons
1-7	154,781 gallons
1-8	176,892 gallons
1-9	199,004 gallons
1-10	221,115 gallons

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1-11	243,227 gallons
1-12	265,338 gallons

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

**III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall maintain monthly records of the following information for emissions units P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044) combined:
  - a. the paint production 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 concentrate production rates.

Also, during the first 12 calendar months of operation following this issuance of this permit, the permittee shall record the cumulative paint concentrate production rate for each calendar month.

2. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack(s) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to eliminate the visible emissions.

**IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of

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the rolling, 12-month paint production rate limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative paint production levels.

2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack(s) serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.
3. The deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part 1 - 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:

0.54 pound of OC per hour

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the EIIP derived OC emission factor of 0.00766 pound of OC per gallon of paint produced by the maximum hourly production rate.

- b. Emission Limitation:

0.11 pound of VOC per hour

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the EIIP derived VOC emission factor of 0.00159 pound of VOC per gallon of paint produced by the maximum hourly production rate.

- c. Emission Limitation:

0.6 pound of PE per hour

Applicable Compliance Method:

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Compliance shall be demonstrated by multiplying the particulate emission factor of 0.005 pound of PE per pound of pigment handled\* by the maximum hourly amount of pigment handled. Stack testing may be required in the future in accordance with the test method(s) and procedures in OAC rule 3745-17-03(B)(10).

\*AP-42 Chapter 6.4 under 6.4.2 states particulate emissions amount to 0.5 - 1.0% of pigment handled. Used 0.5% because emissions unit is located inside the building.

**Issued: To be entered upon final issuance**d. Emission Limitation:

1.13 tons of PE per year for P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044), combined, as a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the particulate emission factor of 0.0085 pound of particulate emissions per gallon of paint produced by the maximum allowable amount of paint produced per year (265,338 gallons per year), and then dividing by 2000 pounds per ton.

e. Emission Limitation:

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

Applicable Compliance Method:

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

f. Emission Limitations:

0.00766 pound of OC per gallon of paint produced  
0.00159 pound of VOC per gallon of paint produced  
0.00106 pound of individual HAP per gallon of paint produced  
0.0022 pound of combined HAP per gallon of paint produced

Applicable Compliance Method:

The emission limitations are equivalent to the emission factors derived using equations from EIIP Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Volume II, Chapter 8, Section 4, Revised Final August 2000, Updated March 14, 2002 and the "worst case" solvent mixture.

g. Emission Limitation:

0.0085 pound of PE per gallon of paint produced

Applicable Compliance Method:

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Compliance shall be demonstrated by multiplying the particulate emission factor of 0.005 pound of particulate emissions per pound of pigment handled\* by the maximum hourly amount of pigment handled, then divided by the maximum gallons processed per hour.

\*AP-42 Table 6.4-1 Note (d) dated 5/83.

h. Emission Limitation:

1.02 tons of OC per year for P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044), combined, as a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the EIIP derived OC emission factor of 0.00766 pound of OC per gallon of paint produced by the maximum allowable amount of paint produced per year (265,338 gallons per year), and then dividing by 2000 pounds per ton.

i. Emission Limitation:

0.21 ton of VOC per year for P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044), combined, as a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the EIIP derived VOC emission factor of 0.00159 pound of VOC per gallon of paint produced by the maximum allowable amount of paint produced per year (265,338 gallons per year), and then dividing by 2000 pounds per ton.

j. Emission Limitation:

0.14 ton of individual HAP per year for P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044), combined, as a rolling, 12-month summation

Applicable Compliance Method:

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Compliance shall be demonstrated by multiplying the EIP derived individual HAP emission factor of 0.00106 pound of individual HAP per gallon of paint produced by the maximum allowable amount of paint produced per year (265,338 gallons per year), and then dividing by 2000 pounds per ton.

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k. Emission Limitation:

0.29 ton of combined HAPs per year for P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044), combined, as a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the EIIP derived combined HAPs emission factor of 0.0022 pound of combined HAPs per gallon of paint produced by the maximum allowable amount of paint produced per year (265,338 gallons per year), and then dividing by 2000 pounds per ton.

**VI. Miscellaneous Requirements**

None

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**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>
P037 - Paint mixing for 250 gallons or less container with medium speed mixers, one filler - Car Color Paint Mixing Station Number 13.	None	See B.VI.1 below.

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

**Issued: To be entered upon final issuance**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit

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to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>
P038 - Paint mixing for 250 gallons or less container with medium speed mixers, one filler - Car Color Paint Mixing Station Number 14.	OAC rule 3745-31-05(A)(3)
	OAC rule 3745-31-05(C)

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	Applicable Emissions Limitations/Control Measures	summation
	0.54 pound of organic compounds (OC) per hour	0.21 ton of VOC per year for P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044), combined, as a rolling, 12-month summation
	0.11 pound of volatile organic compounds (VOC) per hour	
	0.6 pound of particulate emissions (PE) per hour	0.14 ton of individual HAP per year for P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044), combined, as a rolling, 12-month summation
OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed ten percent opacity, as a six-minute average.	
	The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C).	0.29 ton of combined HAPs per year for P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044), combined, as a rolling, 12-month summation
OAC rule 3745-17-11	0.00766 pound of OC per gallon of paint produced	
	0.00159 pound of VOC per gallon of paint produced	1.13 tons of PE per year for P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044), combined, as a rolling, 12-month summation
OAC rule 3745-21-07(G)(2)	0.00106 pound of individual hazardous air pollutant (HAP) per gallon of paint produced	See A.II.1 below.
	0.0022 pound of combined hazardous air pollutants (HAPs) per gallon of paint produced	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	0.0085 pound of PE per gallon of paint produced	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	1.02 tons of OC per year for P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044), combined, as a rolling, 12-month	The emission limitations specified by this rule are less stringent than the emission

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limitation established pursuant to OAC rule 3745-31-05(A)(3).

**2. Additional Terms and Conditions**

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

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

**II. Operational Restrictions**

1. The maximum annual paint production rate for emissions units P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044) shall not exceed 265,338 gallons, 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 paint production levels specified in the following table:

<u>Month</u>	<u>Maximum Allowable Cumulative Paint Production</u>
1	22,112 gallons
1-2	44,223 gallons
1-3	66,335 gallons
1-4	88,446 gallons
1-5	110,558 gallons
1-6	132,669 gallons
1-7	154,781 gallons
1-8	176,892 gallons
1-9	199,004 gallons
1-10	221,115 gallons
1-11	243,227 gallons
1-12	265,338 gallons

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

### III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for emissions units P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044) combined:
  - a. the paint production 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 concentrate production rates.

Also, during the first 12 calendar months of operation following this issuance of this permit, the permittee shall record the cumulative paint concentrate production rate for each calendar month.

2. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack(s) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to eliminate the visible emissions.

### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month paint production rate limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative paint production levels.
2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack(s) serving this emissions unit and (b)

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describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

3. The deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part 1 - 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:

0.54 pound of OC per hour

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the EHIP derived OC emission factor of 0.00766 pound of OC per gallon of paint produced by the maximum hourly production rate.

- b. Emission Limitation:

0.11 pound of VOC per hour

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the EHIP derived VOC emission factor of 0.00159 pound of VOC per gallon of paint produced by the maximum hourly production rate.

- c. Emission Limitation:

0.6 pound of PE per hour

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the particulate emission factor of 0.005 pound of PE per pound of pigment handled\* by the maximum hourly amount of pigment handled. Stack testing may be required in the future in

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accordance with the test method(s) and procedures in OAC rule 3745-17-03(B)(10).

\*AP-42 Chapter 6.4 under 6.4.2 states particulate emissions amount to 0.5 - 1.0% of pigment handled. Used 0.5% because emissions unit is located inside the building.

**Issued: To be entered upon final issuance**d. Emission Limitation:

1.13 tons of PE per year for P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044), combined, as a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the particulate emission factor of 0.0085 pound of particulate emissions per gallon of paint produced by the maximum allowable amount of paint produced per year (265,338 gallons per year), and then dividing by 2000 pounds per ton.

e. Emission Limitation:

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

Applicable Compliance Method:

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

f. Emission Limitations:

0.00766 pound of OC per gallon of paint produced  
0.00159 pound of VOC per gallon of paint produced  
0.00106 pound of individual HAP per gallon of paint produced  
0.0022 pound of combined HAP per gallon of paint produced

Applicable Compliance Method:

The emission limitations are equivalent to the emission factors derived using equations from EIIP Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Volume II, Chapter 8, Section 4, Revised Final August 2000, Updated March 14, 2002 and the "worst case" solvent mixture.

g. Emission Limitation:

0.0085 pound of PE per gallon of paint produced

Applicable Compliance Method:

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Compliance shall be demonstrated by multiplying the particulate emission factor of 0.005 pound of particulate emissions per pound of pigment handled\* by the maximum hourly amount of pigment handled, then divided by the maximum gallons processed per hour.

\*AP-42 Table 6.4-1 Note (d) dated 5/83.

h. Emission Limitations:

1.02 tons of OC per year for P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044), combined, as a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the EIIP derived OC emission factor of 0.00766 pound of OC per gallon of paint produced by the maximum allowable amount of paint produced per year (265,338 gallons per year), and then dividing by 2000 pounds per ton.

i. Emission Limitation:

0.21 ton of VOC per year for P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044), combined, as a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the EIIP derived VOC emission factor of 0.00159 pound of VOC per gallon of paint produced by the maximum allowable amount of paint produced per year (265,338 gallons per year), and then dividing by 2000 pounds per ton.

j. Emission Limitation:

0.14 ton of individual HAP per year for P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044), combined, as a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the EIIP derived individual HAP emission factor of 0.00106 pound of individual HAP per gallon of paint produced by the maximum allowable amount of paint produced per year (265,338 gallons per year), and

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then dividing by 2000 pounds per ton.

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k. Emission Limitation:

0.29 ton of combined HAPs per year for P031, P032, P033, P034, P035, P036, P037, P038, Z044 (P039), Z045 (P040), Z046 (P041), Z047 (P042), Z048 (P043), and Z049 (P044), combined, as a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the EIIP derived combined HAPs emission factor of 0.0022 pound of combined HAPs per gallon of paint produced by the maximum allowable amount of paint produced per year (265,338 gallons per year), and then dividing by 2000 pounds per ton.

**VI. Miscellaneous Requirements**

None

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**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>
P038 - Paint mixing for 250 gallons or less container with medium speed mixers, one filler - Car Color Paint Mixing Station Number 14.	None	See B.VI.1 below.

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

**Plasti-Kote Co**

**PTI Application: 16-02334**

**Issued**

**Facility ID: 1652050060**

Emissions Unit ID: P038

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit

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to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>
R007 - Spray booth - QC Spray Booth.	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)
	OAC rule 3745-31-05(C)

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Applicable Emissions Limitations/Control Measures	See A.II.1 below.
2.47 pounds of organic compounds (OC) per hour	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
1.22 pounds of volatile organic compounds (VOC) per hour	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
0.02 pound of particulate emissions (PE) per hour	The emission limitations specified by this rule are less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
0.1 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(C).
0.79 ton of OC per year, as a rolling 12-month summation	
0.78 ton of VOC per year, as a rolling 12-month summation	
0.08 ton of individual HAP per year, as a rolling 12-month summation	
0.22 ton of combined HAPs per year, as a rolling 12-month summation	

**Issued: To be entered upon final issuance****2. Additional Terms and Conditions**

**2.a** There is no cleanup material employed in this emissions unit.

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

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

**II. Operational Restrictions**

1. The maximum annual coating usage for this emissions unit shall not exceed 536 gallons, based upon a rolling, 12-month summation of the coating usage figures. The OC content, VOC content, individual HAP content, and the combined HAPs content of the coating shall not exceed 2.96 pounds of OC per gallon of coating, 2.91 pounds of VOC per gallon of coating, 0.29 pound of individual HAP per gallon of coating, and 0.81 pound of combined HAPs per gallon of coating. The usage limit results in the following emission limitations: 0.79 ton of OC per year, 0.78 ton of VOC per year, 0.08 ton of individual HAP per year, and 0.22 ton of combined HAPs per year.

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

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**PTI Application: 16-02224**  
**Issued**

**Facility ID: 1652050060**

Emissions Unit ID: R007

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Coating Usage</u>
1	45 gallons
1-2	89 gallons
1-3	134 gallons
1-4	179 gallons
1-5	223 gallons
1-6	268 gallons
1-7	313 gallons
1-8	357 gallons
1-9	402 gallons
1-10	447 gallons
1-11	491 gallons
1-12	536 gallons

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual coating usage limitation shall be based upon a rolling, 12-month summation of the 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 records of the following information for each coating employed in this emissions unit:
  - a. the name and identification number of each coating employed;
  - b. the OC content of each coating, in pounds per gallon;
  - c. the VOC content of each coating, in pounds per gallon;
  - d. the highest individual HAP content of each coating, in pound(s) per gallon; and
  - e. the combined HAPs content of each coating, in pound(s) per gallon.
2. The permittee shall collect and record the following information each month for the coating line:
  - a. the name and identification number of each coating employed;
  - b. the coating usage for each month, in gallons;
  - c. beginning after the first 12 calendar months of operation following the issuance of this

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permit, the rolling, 12-month summation of the coating usage figures.

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

3. 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 quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month 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 coating usage levels.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any record showing the use of a coating which exceeds the OC , VOC, individual HAP, and/or combined HAPs contents specified in Section A.II.1 of these terms and conditions. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after such an occurrence.
3. 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.
4. The deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part 1 - 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:  
  
2.47 pounds of OC per hour  
  
Applicable Compliance Method:

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Compliance shall be demonstrated by multiplying the maximum allowable OC content for any coating (2.96 pounds of OC per gallon) by the maximum hourly gallons of coating employed.

b. Emission Limitation:

1.22 pounds of VOC per hour

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the maximum allowable VOC content for any coating (2.91 pounds of VOC per gallon) by the maximum hourly gallons of coating employed.

c. Emission Limitation:

0.02 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 = 0.65

CE = fractional control efficiency of the control equipment = 0.90

d. Emission Limitation:

0.01 ton of PE per year

Applicable Compliance Method:

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

e. 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)

f. Emission Limitation:

0.79 ton of OC per year, as a rolling 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the maximum allowable OC content for any coating (2.96 pounds of OC per gallon) by the maximum allowable coating usage per year (536 gallons per year), and then divided by 2000 pounds per ton.

g. Emission Limitation:

0.78 ton of VOC per year, as a rolling 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the maximum allowable VOC content for any coating (2.91 pounds of VOC per gallon) by the maximum allowable coating usage per year (536 gallons per year), and then divided by 2000 pounds per ton.

h. Emission Limitation:

0.08 ton of individual HAP per year, as a rolling 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the maximum allowable individual HAP content for any coating (0.29 pound of individual HAP per gallon) by the maximum allowable coating usage per year (536 gallons per year), and then divided by 2000 pounds per ton.

i. Emission Limitation:

0.22 ton of combined HAPs per year, as a rolling 12-month summation

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Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the maximum allowable combined HAPs content for any coating (0.81 pound of combined HAPs per gallon) by the maximum allowable coating usage per year (536 gallons per year), and then divided by 2000 pounds per ton.

**VI. Miscellaneous Requirements**

None

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**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>
R007 - Spray booth - QC Spray Booth.	None	See B.VI.1 below.

**2. Additional Terms and Conditions**

- 2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified

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permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.