



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

3/23/2016

Peter Blais
 HydraTech Engineered Products LLC
 10448 CHESTER ROAD
 Cincinnati, OH 45215

Certified Mail

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 1431480257
 Permit Number: P0120352
 Permit Type: Renewal
 County: Hamilton

Dear Permit Holder:

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

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**
- **What should you do if you notice a spill or environmental emergency?**

How to appeal this permit

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

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

How to save money, reduce pollution and reduce energy consumption

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

How to give us feedback on your permitting experience

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

How to get an electronic copy of your permit

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

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

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

If you have any questions regarding your permit, please contact Southwest Ohio Air Quality Agency at (513)946-7777 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



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

Cc: SWOQA



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
HydraTech Engineered Products LLC**

Facility ID:	1431480257
Permit Number:	P0120352
Permit Type:	Renewal
Issued:	3/23/2016
Effective:	3/23/2016
Expiration:	3/23/2021



Division of Air Pollution Control
Permit-to-Install and Operate
for
HydraTech Engineered Products LLC

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Final Permit-to-Install and Operate
HydraTech Engineered Products LLC
Permit Number: P0120352
Facility ID: 1431480257
Effective Date: 3/23/2016

Authorization

Facility ID: 1431480257
Application Number(s): A0055412
Permit Number: P0120352
Permit Description: FEPTIO renewal permit for eight (8) High Speed Dispersion Mixers
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 3/23/2016
Effective Date: 3/23/2016
Expiration Date: 3/23/2021
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

HydraTech Engineered Products LLC
10448 CHESTER ROAD
Cincinnati, OH 45215

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

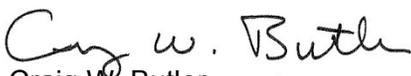
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Southwest Ohio Air Quality Agency
250 William Howard Taft Rd.
Cincinnati, OH 45219
(513)946-7777

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Craig W. Butler
Director



Authorization (continued)

Permit Number: P0120352

Permit Description: FEPTIO renewal permit for eight (8) High Speed Dispersion Mixers

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

Emissions Unit ID: P011
 Company Equipment ID: High speed dispersion mixer 107
 Superseded Permit Number: P0107320
 General Permit Category and Type: Not Applicable

Emissions Unit ID: P017
 Company Equipment ID: High speed dispersion mixer 130
 Superseded Permit Number: P0107320
 General Permit Category and Type: Not Applicable

Group Name: Mixer Group 1

Emissions Unit ID:	P002
Company Equipment ID:	High speed dispersion mixer 104
Superseded Permit Number:	P0107320
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P003
Company Equipment ID:	High speed dispersion mixer 105
Superseded Permit Number:	P0107320
General Permit Category and Type:	Not Applicable

Group Name: Mixer Group 2

Emissions Unit ID:	P004
Company Equipment ID:	High speed dispersion mixer 127
Superseded Permit Number:	P0107320
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P016
Company Equipment ID:	High speed dispersion mixer 126
Superseded Permit Number:	P0107320
General Permit Category and Type:	Not Applicable

Group Name: Mixer Group 3

Emissions Unit ID:	P007
Company Equipment ID:	High speed dispersion mixer 102
Superseded Permit Number:	P0107320
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P012
Company Equipment ID:	High speed dispersion mixer 103
Superseded Permit Number:	P0107320
General Permit Category and Type:	Not Applicable



Final Permit-to-Install and Operate
HydraTech Engineered Products LLC
Permit Number: P0120352
Facility ID: 1431480257
Effective Date: 3/23/2016

A. Standard Terms and Conditions

1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions of this permit will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the [DO/LAA] in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



Final Permit-to-Install and Operate
HydraTech Engineered Products LLC
Permit Number: P0120352
Facility ID: 1431480257
Effective Date: 3/23/2016

B. Facility-Wide Terms and Conditions

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) 2., 3., 4. and 5.
2. The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units P002, P003, P004, P007, P011, P012, P016 and P017 and other de minimis air contaminant sources, as defined in OAC rule 3745-15-05, and other air contaminant sources exempt from the requirement to obtain a permit-to-install pursuant to OAC rule 3745-31-03 installed subsequent to the issuance of this permit, combined, shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.
3. The permittee shall collect and record the following information each month for all materials containing any hazardous air pollutant (HAP)¹ that are applied in the emissions units or air contaminant sources listed in 2 above:
 - a) the name and identification number/code of each liquid organic material utilized containing any HAP;
 - b) the individual Hazardous Air Pollutant (HAP) content for each HAP of each liquid organic material utilized, in pounds of individual HAP per pound of liquid organic material utilized;
 - c) the total combined HAP content of each liquid organic material in pounds of combined HAPs per pound of liquid organic material utilized, (sum all the individual HAP contents from (b));
 - d) the number of pounds of liquid organic material utilized ;
 - e) the name and identification of each cleanup material employed (if applicable);
 - f) the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per pound of cleanup material, utilized;
 - g) the total combined HAP content of each cleanup material, in pounds of combined HAPs per pound of cleanup material utilized(sum all the individual HAP contents from (f));
 - h) the number of pounds of each cleanup material utilized;
 - i) the total individual HAP emissions for each HAP from all liquid organic material utilized and cleanup materials utilized, in pounds or tons per month (for each HAP, the sum of (b) times (d) for each liquid organic material utilized and the sum of (f) times (h) for each cleanup material);

- j) the total combined HAP emissions from all liquid organic material utilized and cleanup materials utilized, in pounds or tons per month [(the sum of (c) times (d) for each liquid organic material utilized plus the sum of (g) times (h) for each cleanup material)];
- k) the rolling, 12-month summation of the controlled individual HAP emissions from all liquid organic material utilized and cleanup materials utilized, in tons per year [(sum of (k) for each HAP for the previous 12 months)]; and
- l) the rolling, 12-month summation of the controlled combined HAP emissions from all coatings and cleanup materials employed, in tons per year [(sum of (l) for the previous 12 months)].

¹A listing of the HAPs can be found in Section 112(b) of the Clean Air Act, or can be obtained by contacting your Ohio EPA District Office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings and cleanup materials.

4. The permittee shall submit quarterly deviation (excursion) reports for emissions units P002, P003, P004, P007, P011, P012, P016 and P017 and other de minimis air contaminant sources, as defined in OAC rule 3745-15-05, and other air contaminant sources exempt from the requirement to obtain a permit-to-install pursuant to OAC rule 3745-31-03 installed subsequent to the issuance of this permit that identify:

- a) all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

See emission limitations in 2. above;

- b) the probable cause of each deviation (excursion);
- c) any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d) the magnitude and duration of each deviation (excursion).

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

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

5. Compliance with the emission limitations in 2. of these terms and conditions shall be determined in accordance with the following method(s) identified below:

- a) Emission Limitations:

Emissions units P002, P003, P004, P007, P011, P012, P016 and P017 and other de minimis air contaminant sources, as defined in OAC rule 3745-15-05, and other air contaminant sources exempt from the requirement to obtain a permit-to-install pursuant to OAC rule 3745-31-03



Final Permit-to-Install and Operate
HydraTech Engineered Products LLC
Permit Number: P0120352
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installed subsequent to the issuance of this permit, combined, shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the HAP emission limitations shall be demonstrated by the methods outlined in the recordkeeping requirements in 3. above.



Final Permit-to-Install and Operate
HydraTech Engineered Products LLC
Permit Number: P0120352
Facility ID: 1431480257
Effective Date: 3/23/2016

C. Emissions Unit Terms and Conditions

1. P011, High speed dispersion mixer 107

Operations, Property and/or Equipment Description:

High Speed Dispersion Mixer 107

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - a. None.
 - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - a. b)(1)b., b)(2)b., d)(1), e)(2), f)(1)c. and f)(1)d.
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Volatile organic compound (VOC) emissions from the mixer shall not exceed 106.8 pounds per day. Particulate emissions (PE) from the mixer shall not exceed 13.3 pounds per day and 2.42 tons per year (TPY). PE=PM10 See b)(2)a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D), OAC rule 3745-17-07(A)(1), OAC rule 3745-17-07(B)(1) and OAC rule 3745-17-08(B).
b.	OAC rule 3745-31-05(D)	Volatile organic compound (VOC) emissions shall not exceed 39.9 TPY for

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		emissions units P002, P003, P004, P007, P011, P012, P016 and P017 combined, based on a rolling, 12-month summation. See b)(2)b. and Section B.2.
c.	OAC rule 3745-17-07(A)(1)	See b)(2)c.
d.	OAC rule 3745-17-07(B)(1)	See b)(2)d.
e.	OAC rule 3745-17-08(B)	The permittee shall minimize or eliminate visible particulate emissions by the use of a cover and dust collector.
f.	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the requirements of OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

- a. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emissions limitations and use of a cover and dust collector.
- b. Paint production shall not result in an exceedance of the following emission limitations:

 The permittee shall emit no more than 39.9 tons of VOC emissions per rolling 12-month period based upon the monthly solvent input rate to emissions units P002, P003, P004, P007, P011, P012, P016 and P017 combined, based on a rolling, 12-month summation.

$$\text{Monthly solvent input rate} = (A \times B \times C) / 2000$$
 where A = the number of pounds of each paint mixed per month, B = the percent by weight solvent of each paint mixed, and C = 0.015 (AP 42 emission factor for amount of VOC emissions in pounds of VOC per pound of solvent in the paint.)

 The permittee has existing records to demonstrate compliance upon issuance of the permit.
- c. Visible particulate emissions from any stack shall not exceed 20 per cent opacity, as a six minute average, except as specified by rule.
- d. Fugitive visible particulate emissions shall not exceed 20% opacity, as a three-minute average.
- e. The daily VOC and daily and annual PE-PM10 emissions limitations outlined are based upon the emissions unit's Potential To Emit (PTE). Therefore, no records are required to demonstrate compliance with these limits.

- c) Operational Restrictions
 - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall collect and record the following information each month for emissions units P002, P003, P004, P007, P011, P012, P016 and P017:
 - a. The name and identification of each batch of paint produced;
 - b. The amount of each paint produced in pounds;
 - c. The percent by weight VOC of each paint mixed;
 - d. The total combined monthly VOC emissions based upon the solvent input rate equation listed in b)(2)b., in tons per month;
 - e. The updated rolling, 12-month summation of VOC emissions based upon the solvent input rate equation listed in b)(2)b. (the summation of the current month's emission total and the previous eleven calendar months emission totals);
 - f. The total combined monthly VOC emissions, in tons per month; and
 - g. The updated rolling, 12-month summation of VOC emissions (the summation of the current month's emission total and the previous eleven months emission totals).
 - (2) The permittee shall collect and record the following information each month for determining the particulate matter emissions:
 - a. The name and identification of each batch of paint produced;
 - b. The total amount of solids used in the formulation of paints, in pounds; and
 - c. The total monthly PM emissions, in tons per months.
- e) Reporting Requirements
 - (1) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is

considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

- (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

All exceedances of the 12-month VOC emissions limitations specified in b)(1)b. and b)(2)b.
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

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

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

- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) Testing Requirements

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

- a. Emission Limitation:

106.8 lbs/day of VOC emissions

Applicable Compliance Method:

The daily VOC emission rate is based upon the emission unit's potential to emit. The potential to emit was calculated by: (maximum production rate in pounds per hour) x (the per cent by weight VOC) x (emission factor of 30 lb VOC per ton of product as found in AP 42 Table 6.4-1, reformatted 1/95).

b. Emission Limitation:

13.3 lbs/day of PE/PM10

Applicable Compliance Method:

The daily PE-PM10 emission rate is based upon the emission unit's potential to emit. The potential to emit was calculated by: (maximum production rate in pounds per hour) x (the per cent by weight PM) x (emission factor of 20 lb/ton of particulate emissions per ton of pigment employed as found in AP 42 Table 6.4-1, reformatted 1/95) x (100 minus overall control efficiency of the fabric filter control).

c. Emission Limitation:

Volatile organic compound (VOC) emissions based upon the solvent input rate equation listed in term b)(2)b. shall not exceed 39.9 TPY for emissions units P002, P003, P004, P007, P011, P012, P016 and P017 combined, based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the annual volatile organic compound emissions based on the solvent input rate equation in term b)(2)b. shall be based on the record keeping requirements as specified in d)(1).

d. Emission Limitation:

Volatile organic compound (VOC) emissions shall not exceed 39.9 TPY for emissions units P002, P003, P004, P007, P011, P012, P016 and P017 combined, based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the annual VOC emission limitation shall be demonstrated by the recordkeeping requirements specified in d)(1).

e. Emission Limitation:

2.42 TPY PE-PM10

Applicable Compliance Method:

Compliance with the annual PE-PM10 limitations shall be demonstrated by the recordkeeping requirements specified in d)(2).

f. Emission Limitation:

Visible particulate emissions from any/the stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule; and visible



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

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

g) Miscellaneous Requirements

- (1) None.

2. P017, High speed dispersion mixer 130

Operations, Property and/or Equipment Description:

High Speed Dispersion Mixer 130

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - a. None.
 - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - a. b)(1)b., b)(2)b., d)(1), e)(2), f)(1)c. and f)(1)d.
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	<p>Volatile organic compound (VOC) emissions from the mixer shall not exceed 146.7 pounds per day.</p> <p>Particulate emissions (PE) from the mixer shall not exceed 18.5 pounds per day and 3.37 tons per year (TPY).</p> <p>PE=PM10</p> <p>See b)(2)a.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D), OAC rule 3745-17-07(A)(1), OAC rule 3745-17-07(B)(1) and OAC rule 3745-17-08(B).</p>
b.	OAC rule 3745-31-05(D)	Volatile organic compound (VOC) emissions shall not exceed 39.9 TPY for

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		emissions units P002, P003, P004, P007, P011, P012, P016 and P017 combined, based on a rolling, 12-month summation. See b)(2)b. and Section B.2.
c.	OAC rule 3745-17-07(A)(1)	See b)(2)c.
d.	OAC rule 3745-17-07(B)(1)	See b)(2)d.
e.	OAC rule 3745-17-08(B)	The permittee shall minimize or eliminate visible particulate emissions by the use of a cover and dust collector.
f.	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the requirements of OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

- a. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emissions limitations and use of a cover and dust collector.
- b. Paint production shall not result in an exceedance of the following emission limitations:

 The permittee shall emit no more than 39.9 tons of VOC emissions per rolling 12-month period based upon the monthly solvent input rate to emissions units P002, P003, P004, P007, P011, P012, P016 and P017 combined, based on a rolling, 12-month summation.

$$\text{Monthly solvent input rate} = (A \times B \times C) / 2000$$
 where A = the number of pounds of each paint mixed per month, B = the percent by weight solvent of each paint mixed, and C = 0.015 (AP 42 emission factor for amount of VOC emissions in pounds of VOC per pound of solvent in the paint.)

 The permittee has existing records to demonstrate compliance upon issuance of the permit.
- c. Visible particulate emissions from any stack shall not exceed 20 per cent opacity, as a six minute average, except as specified by rule.
- d. Fugitive visible particulate emissions shall not exceed 20% opacity, as a three-minute average.
- e. The daily VOC and daily and annual PE-PM10 emissions limitations outlined are based upon the emissions unit's Potential To Emit (PTE). Therefore, no records are required to demonstrate compliance with these limits.

- c) Operational Restrictions
 - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall collect and record the following information each month for emissions units P002, P003, P004, P007, P011, P012, P016 and P017:
 - a. The name and identification of each batch of paint produced;
 - b. The amount of each paint produced in pounds;
 - c. The percent by weight VOC of each paint mixed;
 - d. The total combined monthly VOC emissions based upon the solvent input rate equation listed in b)(2)b., in tons per month;
 - e. The updated rolling, 12-month summation of VOC emissions based upon the solvent input rate equation listed in b)(2)b. (the summation of the current month's emission total and the previous eleven calendar months emission totals);
 - f. The total combined monthly VOC emissions, in tons per month; and
 - g. The updated rolling, 12-month summation of VOC emissions (the summation of the current month's emission total and the previous eleven months emission totals).
 - (2) The permittee shall collect and record the following information each month for determining the particulate matter emissions:
 - a. The name and identification of each batch of paint produced;
 - b. The total amount of solids used in the formulation of paints, in pounds; and
 - c. The total monthly PM emissions, in tons per months.
- e) Reporting Requirements
 - (1) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is

considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

- (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

All exceedances of the 12-month VOC emissions limitations specified in b)(1)b. and b)(2)b.
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

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

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

- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) Testing Requirements

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

- a. Emission Limitation:

146.7 lbs/day of VOC emissions

Applicable Compliance Method:

The daily VOC emission rate is based upon the emission unit's potential to emit. The potential to emit was calculated by: (maximum production rate in pounds per hour) x (the per cent by weight VOC) x (emission factor of 30 lb VOC per ton of product as found in AP 42 Table 6.4-1, reformatted 1/95).

b. Emission Limitation:

18.5 lbs/day of PE/PM10

Applicable Compliance Method:

The daily PE-PM10 emission rate is based upon the emission unit's potential to emit. The potential to emit was calculated by: (maximum production rate in pounds per hour) x (the per cent by weight PM) x (emission factor of 20 lb/ton of particulate emissions per ton of pigment employed as found in AP 42 Table 6.4-1, reformatted 1/95) x (100 minus overall control efficiency of the fabric filter control).

c. Emission Limitation:

Volatile organic compound (VOC) emissions based upon the solvent input rate equation listed in term b)(2)b. shall not exceed 39.9 TPY for emissions units P002, P003, P004, P007, P011, P012, P016 and P017 combined, based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the annual volatile organic compound emissions based on the solvent input rate equation in term b)(2)b. shall be based on the record keeping requirements as specified in d)(1).

d. Emission Limitation:

Volatile organic compound (VOC) emissions shall not exceed 39.9 TPY for emissions units P002, P003, P004, P007, P011, P012, P016 and P017 combined, based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the annual VOC emission limitation shall be demonstrated by the recordkeeping requirements specified in d)(1).

e. Emission Limitation:

3.37 TPY PE-PM10

Applicable Compliance Method:

Compliance with the annual PE-PM10 limitations shall be demonstrated by the recordkeeping requirements specified in d)(2).

f. Emission Limitation:

Visible particulate emissions from any/the stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule; and visible



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

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

g) Miscellaneous Requirements

- (1) None.

3. Emissions Unit Group -Mixer Group 1: P002,P003

EU ID	Operations, Property and/or Equipment Description
P002	High Speed Dispersion Mixer 104
P003	High Speed Dispersion Mixer 105

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

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

a. None.

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

a. b)(1)b., b)(2)b., d)(1), e)(2), f)(1)c. and f)(1)d.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	<p>Volatile organic compound (VOC) emissions from the mixer shall not exceed 71.1 pounds per day.</p> <p>Particulate emissions (PE) from the mixer shall not exceed 8.8 pounds per day and 1.61 tons per year (TPY).</p> <p>PE=PM10</p> <p>See b)(2)a.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D), OAC rule 3745-17-07(A)(1), OAC rule 3745-17-07(B)(1) and OAC rule 3745-17-08(B).</p>

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-31-05(D)	<p>Volatile organic compound (VOC) emissions shall not exceed 39.9 TPY for emissions units P002, P003, P004, P007, P011, P012, P016 and P017 combined, based on a rolling, 12-month summation.</p> <p>See b)(2)b. and Section B.2.</p>
c.	OAC rule 3745-17-07(A)(1)	See b)(2)c.
d.	OAC rule 3745-17-07(B)(1)	See b)(2)d.
e.	OAC rule 3745-17-08(B)	The permittee shall minimize or eliminate visible particulate emissions by the use of a cover and dust collector.
f.	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the requirements of OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

a. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emissions limitations and use of a cover and dust collector.

b. Paint production shall not result in an exceedance of the following emission limitations:

The permittee shall emit no more than 39.9 tons of VOC emissions per rolling 12-month period based upon the monthly solvent input rate to emissions units P002, P003, P004, P007, P011, P012, P016 and P017 combined, based on a rolling, 12-month summation.

Monthly solvent input rate = $(A \times B \times C) / 2000$ where A = the number of pounds of each paint mixed per month, B = the percent by weight solvent of each paint mixed, and C = 0.015 (AP 42 emission factor for amount of VOC emissions in pounds of VOC per pound of solvent in the paint.)

The permittee has existing records to demonstrate compliance upon issuance of the permit.

c. Visible particulate emissions from any stack shall not exceed 20 per cent opacity, as a six minute average, except as specified by rule.

d. Fugitive visible particulate emissions shall not exceed 20% opacity, as a three-minute average.

e. The daily VOC and daily and annual PE-PM10 emissions limitations outlined are based upon the emissions unit's Potential To Emit (PTE). Therefore, no records are required to demonstrate compliance with these limits.

- c) Operational Restrictions
 - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall collect and record the following information each month for emissions units P002, P003, P004, P007, P011, P012, P016 and P017:
 - a. The name and identification of each batch of paint produced;
 - b. The amount of each paint produced in pounds;
 - c. The percent by weight VOC of each paint mixed;
 - d. The total combined monthly VOC emissions based upon the solvent input rate equation listed in b)(2)b., in tons per month;
 - e. The updated rolling, 12-month summation of VOC emissions based upon the solvent input rate equation listed in b)(2)b. (the summation of the current month's emission total and the previous eleven calendar months emission totals);
 - f. The total combined monthly VOC emissions, in tons per month; and
 - g. The updated rolling, 12-month summation of VOC emissions (the summation of the current month's emission total and the previous eleven months emission totals).
 - (2) The permittee shall collect and record the following information each month for determining the particulate matter emissions:
 - a. The name and identification of each batch of paint produced;
 - b. The total amount of solids used in the formulation of paints, in pounds; and
 - c. The total monthly PM emissions, in tons per months.
- e) Reporting Requirements
 - (1) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is

considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

- (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

All exceedances of the 12-month VOC emissions limitations specified in b)(1)b. and b)(2)b.
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

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

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

- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) Testing Requirements

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

- a. Emission Limitation:

71.1 lbs/day of VOC emissions

Applicable Compliance Method:

The daily VOC emission rate is based upon the emission unit's potential to emit. The potential to emit was calculated by: (maximum production rate in pounds per hour) x (the per cent by weight VOC) x (emission factor of 30 lb VOC per ton of product as found in AP 42 Table 6.4-1, reformatted 1/95).

b. Emission Limitation:

8.8 lbs/day of PE/PM10

Applicable Compliance Method:

The daily PE-PM10 emission rate is based upon the emission unit's potential to emit. The potential to emit was calculated by: (maximum production rate in pounds per hour) x (the per cent by weight PM) x (emission factor of 20 lb/ton of particulate emissions per ton of pigment employed as found in AP 42 Table 6.4-1, reformatted 1/95) x (100 minus overall control efficiency of the fabric filter control).

c. Emission Limitation:

Volatile organic compound (VOC) emissions based upon the solvent input rate equation listed in term b)(2)b. shall not exceed 39.9 TPY for emissions units P002, P003, P004, P007, P011, P012, P016 and P017 combined, based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the annual volatile organic compound emissions based on the solvent input rate equation in term b)(2)b. shall be based on the record keeping requirements as specified in d)(1).

d. Emission Limitation:

Volatile organic compound (VOC) emissions shall not exceed 39.9 TPY for emissions units P002, P003, P004, P007, P011, P012, P016 and P017 combined, based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the annual VOC emission limitation shall be demonstrated by the recordkeeping requirements specified in d)(1).

e. Emission Limitation:

1.61 TPY PE-PM10

Applicable Compliance Method:

Compliance with the annual PE-PM10 limitations shall be demonstrated by the recordkeeping requirements specified in d)(2).

f. Emission Limitation:

Visible particulate emissions from any/the stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule; and visible



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

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

g) Miscellaneous Requirements

- (1) None.

4. Emissions Unit Group -Mixer Group 2: P004,P016

EU ID	Operations, Property and/or Equipment Description
P004	High Speed Dispersion Mixer 106
P016	High Speed Dispersion Mixer 126

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

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

a. None.

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

a. b)(1)b., b)(2)b., d)(1), e)(2), f)(1)c. and f)(1)d.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	<p>Volatile organic compound (VOC) emissions from the mixer shall not exceed 147.5 pounds per day.</p> <p>Particulate emissions (PE) from the mixer shall not exceed 18.5 pounds per day and 3.37 tons per year (TPY).</p> <p>PE=PM10</p> <p>See b)(2)a.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D), OAC rule 3745-17-07(A)(1), OAC rule 3745-17-07(B)(1) and OAC rule 3745-17-08(B).</p>

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-31-05(D)	<p>Volatile organic compound (VOC) emissions shall not exceed 39.9 TPY for emissions units P002, P003, P004, P007, P011, P012, P016 and P017 combined, based on a rolling, 12-month summation.</p> <p>See b)(2)b. and Section B.2.</p>
c.	OAC rule 3745-17-07(A)(1)	See b)(2)c.
d.	OAC rule 3745-17-07(B)(1)	See b)(2)d.
e.	OAC rule 3745-17-08(B)	The permittee shall minimize or eliminate visible particulate emissions by the use of a cover and dust collector.
f.	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the requirements of OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

- a. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emissions limitations and use of a cover and dust collector.
- b. Paint production shall not result in an exceedance of the following emission limitations:

The permittee shall emit no more than 39.9 tons of VOC emissions per rolling 12-month period based upon the monthly solvent input rate to emissions units P002, P003, P004, P007, P011, P012, P016 and P017 combined, based on a rolling, 12-month summation.

Monthly solvent input rate = $(A \times B \times C) / 2000$ where A = the number of pounds of each paint mixed per month, B = the percent by weight solvent of each paint mixed, and C = 0.015 (AP 42 emission factor for amount of VOC emissions in pounds of VOC per pound of solvent in the paint.)

The permittee has existing records to demonstrate compliance upon issuance of the permit.

- c. Visible particulate emissions from any stack shall not exceed 20 per cent opacity, as a six minute average, except as specified by rule.
- d. Fugitive visible particulate emissions shall not exceed 20% opacity, as a three-minute average.
- e. The daily VOC and daily and annual PE-PM10 emissions limitations outlined are based upon the emissions unit's Potential To Emit (PTE). Therefore, no records are required to demonstrate compliance with these limits.

- c) Operational Restrictions
 - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall collect and record the following information each month for emissions units P002, P003, P004, P007, P011, P012, P016 and P017:
 - a. The name and identification of each batch of paint produced;
 - b. The amount of each paint produced in pounds;
 - c. The percent by weight VOC of each paint mixed;
 - d. The total combined monthly VOC emissions based upon the solvent input rate equation listed in b)(2)b., in tons per month;
 - e. The updated rolling, 12-month summation of VOC emissions based upon the solvent input rate equation listed in b)(2)b. (the summation of the current month's emission total and the previous eleven calendar months emission totals);
 - f. The total combined monthly VOC emissions, in tons per month; and
 - g. The updated rolling, 12-month summation of VOC emissions (the summation of the current month's emission total and the previous eleven months emission totals).
 - (2) The permittee shall collect and record the following information each month for determining the particulate matter emissions:
 - a. The name and identification of each batch of paint produced;
 - b. The total amount of solids used in the formulation of paints, in pounds; and
 - c. The total monthly PM emissions, in tons per months.
- e) Reporting Requirements
 - (1) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is

considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

- (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

All exceedances of the 12-month VOC emissions limitations specified in b)(1)b. and b)(2)b.
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

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

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

- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) Testing Requirements

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

- a. Emission Limitation:

147.5 lbs/day of VOC emissions

Applicable Compliance Method:

The daily VOC emission rate is based upon the emission unit's potential to emit. The potential to emit was calculated by: (maximum production rate in pounds per hour) x (the per cent by weight VOC) x (emission factor of 30 lb VOC per ton of product as found in AP 42 Table 6.4-1, reformatted 1/95).

b. Emission Limitation:

18.5 lbs/day of PE/PM10

Applicable Compliance Method:

The daily PE-PM10 emission rate is based upon the emission unit's potential to emit. The potential to emit was calculated by: (maximum production rate in pounds per hour) x (the per cent by weight PM) x (emission factor of 20 lb/ton of particulate emissions per ton of pigment employed as found in AP 42 Table 6.4-1, reformatted 1/95) x (100 minus overall control efficiency of the fabric filter control).

c. Emission Limitation:

Volatile organic compound (VOC) emissions based upon the solvent input rate equation listed in term b)(2)b. shall not exceed 39.9 TPY for emissions units P002, P003, P004, P007, P011, P012, P016 and P017 combined, based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the annual volatile organic compound emissions based on the solvent input rate equation in term b)(2)b. shall be based on the record keeping requirements as specified in d)(1).

d. Emission Limitation:

Volatile organic compound (VOC) emissions shall not exceed 39.9 TPY for emissions units P002, P003, P004, P007, P011, P012, P016 and P017 combined, based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the annual VOC emission limitation shall be demonstrated by the recordkeeping requirements specified in d)(1).

e. Emission Limitation:

3.37 TPY PE-PM10

Applicable Compliance Method:

Compliance with the annual PE-PM10 limitations shall be demonstrated by the recordkeeping requirements specified in d)(2).

f. Emission Limitation:

Visible particulate emissions from any/the stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule; and visible



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

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

g) Miscellaneous Requirements

- (1) None.

5. Emissions Unit Group -Mixer Group 3: P007,P012

EU ID	Operations, Property and/or Equipment Description
P007	High Speed Dispersion Mixer 102
P012	High Speed Dispersion Mixer 103

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - a. None.
 - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - a. b)(1)b., b)(2)b., d)(1), e)(2), f)(1)c. and f)(1)d.
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	<p>Volatile organic compound (VOC) emissions from the mixer shall not exceed 133.4 pounds per day.</p> <p>Particulate emissions (PE) from the mixer shall not exceed 16.6 pounds per day and 3.03 tons per year (TPY).</p> <p>PE=PM10</p> <p>See b)(2)a.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D), OAC rule 3745-17-07(A)(1), OAC rule 3745-17-07(B)(1) and OAC rule 3745-17-08(B).</p>

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-31-05(D)	<p>Volatile organic compound (VOC) emissions shall not exceed 39.9 TPY for emissions units P002, P003, P004, P007, P011, P012, P016 and P017 combined, based on a rolling, 12-month summation.</p> <p>See b)(2)b. and Section B.2.</p>
c.	OAC rule 3745-17-07(A)(1)	See b)(2)c.
d.	OAC rule 3745-17-07(B)(1)	See b)(2)d.
e.	OAC rule 3745-17-08(B)	The permittee shall minimize or eliminate visible particulate emissions by the use of a cover and dust collector.
f.	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the requirements of OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

a. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emissions limitations and use of a cover and dust collector.

b. Paint production shall not result in an exceedance of the following emission limitations:

The permittee shall emit no more than 39.9 tons of VOC emissions per rolling 12-month period based upon the monthly solvent input rate to emissions units P002, P003, P004, P007, P011, P012, P016 and P017 combined, based on a rolling, 12-month summation.

Monthly solvent input rate = $(A \times B \times C) / 2000$ where A = the number of pounds of each paint mixed per month, B = the percent by weight solvent of each paint mixed, and C = 0.015 (AP 42 emission factor for amount of VOC emissions in pounds of VOC per pound of solvent in the paint.)

The permittee has existing records to demonstrate compliance upon issuance of the permit.

c. Visible particulate emissions from any stack shall not exceed 20 per cent opacity, as a six minute average, except as specified by rule.

d. Fugitive visible particulate emissions shall not exceed 20% opacity, as a three-minute average.

e. The daily VOC and daily and annual PE-PM10 emissions limitations outlined are based upon the emissions unit's Potential To Emit (PTE). Therefore, no records are required to demonstrate compliance with these limits.

- c) Operational Restrictions
 - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall collect and record the following information each month for emissions units P002, P003, P004, P007, P011, P012, P016 and P017:
 - a. The name and identification of each batch of paint produced;
 - b. The amount of each paint produced in pounds;
 - c. The percent by weight VOC of each paint mixed;
 - d. The total combined monthly VOC emissions based upon the solvent input rate equation listed in b)(2)b., in tons per month;
 - e. The updated rolling, 12-month summation of VOC emissions based upon the solvent input rate equation listed in b)(2)b. (the summation of the current month's emission total and the previous eleven calendar months emission totals);
 - f. The total combined monthly VOC emissions, in tons per month; and
 - g. The updated rolling, 12-month summation of VOC emissions (the summation of the current month's emission total and the previous eleven months emission totals).
 - (2) The permittee shall collect and record the following information each month for determining the particulate matter emissions:
 - a. The name and identification of each batch of paint produced;
 - b. The total amount of solids used in the formulation of paints, in pounds; and
 - c. The total monthly PM emissions, in tons per months.
- e) Reporting Requirements
 - (1) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is

considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

- (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

All exceedances of the 12-month VOC emissions limitations specified in b)(1)b. and b)(2)b.
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

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

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

- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) Testing Requirements

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

- a. Emission Limitation:

133.4 lbs/day of VOC emissions

Applicable Compliance Method:

The daily VOC emission rate is based upon the emission unit's potential to emit. The potential to emit was calculated by: (maximum production rate in pounds per hour) x (the per cent by weight VOC) x (emission factor of 30 lb VOC per ton of product as found in AP 42 Table 6.4-1, reformatted 1/95).

b. Emission Limitation:

16.6 lbs/day of PE/PM10

Applicable Compliance Method:

The daily PE-PM10 emission rate is based upon the emission unit's potential to emit. The potential to emit was calculated by: (maximum production rate in pounds per hour) x (the per cent by weight PM) x (emission factor of 20 lb/ton of particulate emissions per ton of pigment employed as found in AP 42 Table 6.4-1, reformatted 1/95) x (100 minus overall control efficiency of the fabric filter control).

c. Emission Limitation:

Volatile organic compound (VOC) emissions based upon the solvent input rate equation listed in term b)(2)b. shall not exceed 39.9 TPY for emissions units P002, P003, P004, P007, P011, P012, P016 and P017 combined, based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the annual volatile organic compound emissions based on the solvent input rate equation in term b)(2)b. shall be based on the record keeping requirements as specified in d)(1).

d. Emission Limitation:

Volatile organic compound (VOC) emissions shall not exceed 39.9 TPY for emissions units P002, P003, P004, P007, P011, P012, P016 and P017 combined, based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the annual VOC emission limitation shall be demonstrated by the recordkeeping requirements specified in d)(1).

e. Emission Limitation:

3.03 TPY PE-PM10

Applicable Compliance Method:

Compliance with the annual PE-PM10 limitations shall be demonstrated by the recordkeeping requirements specified in d)(2).

f. Emission Limitation:

Visible particulate emissions from any/the stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule; and visible



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

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

g) Miscellaneous Requirements

- (1) None.