



State of Ohio Environmental Protection Agency

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

CERTIFIED MAIL

Street Address:

122 S. Front Street

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

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 16-02074

DATE: 9/21/2000

Russell Products Co., Inc./Devalera Div.
Tom Allen
275 North Forge Street
Akron, OH 44304

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

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

Very truly yours,

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

cc: USEPA

ARAQMD



Permit To Install

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

FINAL PERMIT TO INSTALL 16-02074

Application Number: 16-02074
APS Premise Number: 1677010998
Permit Fee: **\$1000**
Name of Facility: Russell Products Co., Inc./Devalera Div.
Person to Contact: Tom Allen
Address: 275 North Forge Street
Akron, OH 44304

Location of proposed air contaminant source(s) [emissions unit(s)]:
1200 Devalera Street
Akron, Ohio

Description of proposed emissions unit(s):
Modification to Existing Permit to Install (Supersede) - Spray Booths to be Permitted Separately.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency



Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping 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 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. Records Retention Requirements

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.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized

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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 verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. 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 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. 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 emissions unit(s) that is (are) served by such control system(s).

6. 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.

7. 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.

8. Termination of Permit to Install

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

9. 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 are inadequate 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 prove to be inadequate or cannot meet applicable standards.

10. 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.

11. Applicability

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

12. 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.

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

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

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14. Construction Compliance Certification

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

15. 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.

B. 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>
VOCs	16
particulates	2

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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>
K001 - Booth #1 (A-Line) - miscellaneous metal parts coating line, including spray booth exhaust filters, HVLP spray guns, and flash-off oven, cleanup performed separately from this emissions unit	OAC rule 3745-31-05 OAC rule 3745-21-09(U)(1)(c)	0.92 pound/hour and 4.0 tons/year of volatile organic compounds (VOCs) [See A.2, B.1, and B.2 below] 3.5 pounds of VOCs per gallon of coating, excluding water and exempt solvents, for an extreme performance coating (daily volume-weighted average)

2. Additional Terms and Conditions

- 2.a The above hourly and yearly VOC emission limits (regulated under OAC rule 3745-31-05) are based on the potential to emit for this emissions unit, as determined from permit application data. Therefore, no recordkeeping, reporting, nor emissions calculations are required to demonstrate compliance with these emission limits. However, if any proposed change(s), such as with coating formulations, thinning or reducing ratios, maximum coating application rate capacity, etc., or any other change(s), increase(s) the emissions unit's potential to emit, 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).

B. Operational Restrictions

- 1. The permittee shall employ properly installed and maintained spray booth exhaust fan filter elements to catch paint overspray at all times the emissions unit is in operation.
- 2. The permittee shall not perform any cleanup in this emissions unit. Any necessary cleanup shall

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Russel

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Issued: 9/21/2000

Emissions Unit ID: **K001**

take place in an operation separate from this emissions unit.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for the line:
 - a. The name and identification number of each coating, as applied.
 - b. The VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied.
 - c. The daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for $C_{VOC,2}$.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings. 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 30 days following the end of the calendar month.

E. Testing Requirements

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

- a. Emission Limitation: 3.5 pounds of VOCs per gallon of coating, excluding water and exempt solvents (daily volume-weighted average), for an extreme performance coating.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Section C. In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

- b. Emission Limitations: 0.92 pound/hour and 4.0 tons/year of VOCs

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Facility ID: 1677010998

Emissions Unit ID: **K001**

Applicable Compliance Method: The VOC emissions limitations are based upon the emission unit's potential to emit:

$$\begin{aligned} \text{PTE}[\text{VOCs}]_h &= (\text{CARC}_{\text{max}}) \times (\text{VOCC}_{\text{max}}); \text{ and} \\ \text{PTE}[\text{VOCs}]_y &= (\text{PTE}[\text{VOCs}]_h) \times (8760 \text{ hours/year}) \times (1 \text{ ton}/2000 \text{ pounds}). \end{aligned}$$

Where:

$\text{PTE}[\text{VOCs}]_h = 0.92$ pound of VOCs/hour [hourly potential to emit VOCs];

$\text{PTE}[\text{VOCs}]_y = 4.0$ tons of VOCs/year [yearly potential to emit VOCs];

$\text{CARC}_{\text{max}} = 1.0$ gallon of coating/hour [maximum coating application rate capacity, coatings as applied after any thinning]; and

$\text{VOCC}_{\text{max}} = 0.92$ pound of VOCs/gallon of coating [maximum VOC content of coatings as applied after any thinning].

F. 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 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.
2. This permit to install (PTI) supersedes all of the requirements of PTI 16-797 issued October 12, 1989.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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>
K002 - Booth #2 (A-Line) - miscellaneous metal parts coating line, including spray booth exhaust filters, HVLP spray guns, and cure oven, cleanup performed separately from this emissions unit	OAC rule 3745-31-05	0.92 pound/hour and 4.0 tons/year of volatile organic compounds (VOCs) [See A.2, B.1, and B.2 below]
	OAC rule 3745-21-09(U)(1)(c)	3.5 pounds of VOCs per gallon of coating, excluding water and exempt solvents, for an extreme performance coating (daily volume-weighted average)

2. Additional Terms and Conditions

- 2.a The above hourly and yearly VOC emission limits (regulated under OAC rule 3745-31-05) are based on the potential to emit for this emissions unit, as determined from permit application data. Therefore, no recordkeeping, reporting, nor emissions calculations are required to demonstrate compliance with these emission limits. However, if any proposed change(s), such as with coating formulations, thinning or reducing ratios, maximum coating application rate capacity, etc., or any other change(s), increase(s) the emissions unit's potential to emit, 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).

B. Operational Restrictions

1. The permittee shall employ properly installed and maintained spray booth exhaust fan filter elements to catch paint overspray at all times the emissions unit is in operation.

2. The permittee shall not perform any cleanup in this emissions unit. Any necessary cleanup shall take place in an operation separate from this emissions unit.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for the line:
 - a. The name and identification number of each coating, as applied.
 - b. The VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied.
 - c. The daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for $C_{VOC,2}$.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings. 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 30 days following the end of the calendar month.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation: 3.5 pounds of VOCs per gallon of coating, excluding water and exempt solvents (daily volume-weighted average), for an extreme performance coating.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Section C. In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

- b. Emission Limitations: 0.92 pound/hour and 4.0 tons/year of VOCs

Applicable Compliance Method: The VOC emissions limitations are based upon the emission unit's potential to emit:

$$\begin{aligned} \text{PTE[VOCs]h} &= (\text{CARCmax}) \times (\text{VOCCmax}); \text{ and} \\ \text{PTE[VOCs]y} &= (\text{PTE[VOCs]h}) \times (8760 \text{ hours/year}) \times (1 \text{ ton}/2000 \text{ pounds}). \end{aligned}$$

Where:

$\text{PTE[VOCs]h} = 0.92$ pound of VOCs/hour [hourly potential to emit VOCs];

$\text{PTE[VOCs]y} = 4.0$ tons of VOCs/year [yearly potential to emit VOCs];

$\text{CARCmax} = 1.0$ gallon of coating/hour [maximum coating application rate capacity, coatings as applied after any thinning]; and

$\text{VOCCmax} = 0.92$ pound of VOCs/gallon of coating [maximum VOC content of coatings as applied after any thinning].

F. 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 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.
2. This permit to install (PTI) supersedes all of the requirements of PTI 16-797 issued October 12, 1989.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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>
K007 - Booth #4 (B-Line) - miscellaneous metal parts coating line, including spray booth exhaust filters, HVLP spray guns, and flash-off and cure ovens, cleanup performed separately from this emissions unit	OAC rule 3745-31-05	0.92 pound/hour and 4.0 tons/year of volatile organic compounds (VOCs) [See A.2, B.1, and B.2 below]
	OAC rule 3745-21-09(U)(1)(c)	3.5 pounds of VOCs per gallon of coating, excluding water and exempt solvents, for an extreme performance coating (daily volume-weighted average)

2. Additional Terms and Conditions

- 2.a The above hourly and yearly VOC emission limits (regulated under OAC rule 3745-31-05) are based on the potential to emit for this emissions unit, as determined from permit application data. Therefore, no recordkeeping, reporting, nor emissions calculations are required to demonstrate compliance with these emission limits. However, if any proposed change(s), such as with coating formulations, thinning or reducing ratios, maximum coating application rate capacity, etc., or any other change(s), increase(s) the emissions unit's potential to emit, 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).

B. Operational Restrictions

1. The permittee shall employ properly installed and maintained spray booth exhaust fan filter elements to catch paint overspray at all times the emissions unit is in operation.

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Facility ID: 1677010998

Emissions Unit ID: **K007**

2. The permittee shall not perform any cleanup in this emissions unit. Any necessary cleanup shall take place in an operation separate from this emissions unit.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for the line:
 - a. The name and identification number of each coating, as applied.
 - b. The VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied.
 - c. The daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for $C_{VOC,2}$.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings. 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 30 days following the end of the calendar month.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation: 3.5 pounds of VOCs per gallon of coating, excluding water and exempt solvents (daily volume-weighted average), for an extreme performance coating.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Section C. In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

- b.** Emission Limitations: 0.92 pound/hour and 4.0 tons/year of VOCs

Applicable Compliance Method: The VOC emissions limitations are based upon the emission unit's potential to emit:

$$\begin{aligned} \text{PTE}[\text{VOCs}]_h &= (\text{CARC}_{\text{max}}) \times (\text{VOCC}_{\text{max}}); \text{ and} \\ \text{PTE}[\text{VOCs}]_y &= (\text{PTE}[\text{VOCs}]_h) \times (8760 \text{ hours/year}) \times (1 \text{ ton}/2000 \text{ pounds}). \end{aligned}$$

Where:

$\text{PTE}[\text{VOCs}]_h = 0.92$ pound of VOCs/hour [hourly potential to emit VOCs];

$\text{PTE}[\text{VOCs}]_y = 4.0$ tons of VOCs/year [yearly potential to emit VOCs];

$\text{CARC}_{\text{max}} = 1.0$ gallon of coating/hour [maximum coating application rate capacity, coatings as applied after any thinning]; and

$\text{VOCC}_{\text{max}} = 0.92$ pound of VOCs/gallon of coating [maximum VOC content of coatings as applied after any thinning].

F. 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 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.
2. This permit to install (PTI) supersedes all of the requirements of PTI 16-797 issued October 12, 1989.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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>
K008 - Booth #5 (B-Line) - miscellaneous metal parts coating line, including spray booth exhaust filters, HVLP spray guns, and flash-off and cure ovens, cleanup performed separately from this emissions unit	OAC rule 3745-31-05	0.92 pound/hour and 4.0 tons/year of volatile organic compounds (VOCs) [See A.2, B.1, and B.2 below]
	OAC rule 3745-21-09(U)(1)(c)	3.5 pounds of VOCs per gallon of coating, excluding water and exempt solvents, for an extreme performance coating (daily volume-weighted average)

2. Additional Terms and Conditions

- 2.a The above hourly and yearly VOC emission limits (regulated under OAC rule 3745-31-05) are based on the potential to emit for this emissions unit, as determined from permit application data. Therefore, no recordkeeping, reporting, nor emissions calculations are required to demonstrate compliance with these emission limits. However, if any proposed change(s), such as with coating formulations, thinning or reducing ratios, maximum coating application rate capacity, etc., or any other change(s), increase(s) the emissions unit's potential to emit, 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).

B. Operational Restrictions

1. The permittee shall employ properly installed and maintained spray booth exhaust fan filter elements to catch paint overspray at all times the emissions unit is in operation.
2. The permittee shall not perform any cleanup in this emissions unit. Any necessary cleanup shall

take place in an operation separate from this emissions unit.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for the line:
 - a. The name and identification number of each coating, as applied.
 - b. The VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied.
 - c. The daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for $C_{VOC,2}$.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings. 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 30 days following the end of the calendar month.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation: 3.5 pounds of VOCs per gallon of coating, excluding water and exempt solvents (daily volume-weighted average), for an extreme performance coating.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Section C. In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

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- b.** Emission Limitations: 0.92 pound/hour and 4.0 tons/year of VOCs

Applicable Compliance Method: The VOC emissions limitations are based upon the emission unit's potential to emit:

$PTE[VOCs]_h = (CARC_{max}) \times (VOCC_{max})$; and

$PTE[VOCs]_y = (PTE[VOCs]_h) \times (8760 \text{ hours/year}) \times (1 \text{ ton}/2000 \text{ pounds})$.

Where:

$PTE[VOCs]_h = 0.92 \text{ pound of VOCs/hour}$ [hourly potential to emit VOCs];

$PTE[VOCs]_y = 4.0 \text{ tons of VOCs/year}$ [yearly potential to emit VOCs];

$CARC_{max} = 1.0 \text{ gallon of coating/hour}$ [maximum coating application rate capacity, coatings as applied after any thinning]; and

$VOCC_{max} = 0.92 \text{ pound of VOCs/gallon of coating}$ [maximum VOC content of coatings as applied after any thinning].

F. 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 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.
2. This permit to install (PTI) supersedes all of the requirements of PTI 16-797 issued October 12, 1989.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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>
P002 - Booth #3 (B-Line) - stainless steel metallizing process, including electric arc spray guns, and cabinet baffle	OAC rule 3745-31-05	10% opacity from any stack, as a 6-minute average; and 0.5 lb/hr and 2 tpy of particulate matter (PM) [See sections A.2 and B.1 below for additional requirements of OAC rule 3745-31-05.]
	OAC rule 3745-17-07	The visible particulate emissions limitation required by OAC rule 3745-17-07 is less stringent than the visible particulate emissions limitation established pursuant to OAC rule 3745-31-05.
	OAC rule 3745-17-11	The mass particulate emissions limitation required by OAC rule 3745-17-11 is less stringent than the mass particulate emissions limitation established pursuant to OAC rule 3745-31-05.

2. Additional Terms and Conditions

- 2.a The permittee shall properly operate, and maintain P002, in accordance with the manufacturer’s recommendations, instructions, and operating manuals.

- 2.b** The above hourly and yearly mass PM emission limitations (regulated under OAC rule 3745-31-05) are based upon the potential to emit for this emissions unit (determined from material balance assumptions), as demonstrated below in section E.1.b. Therefore, no recordkeeping, reporting, nor emission calculations are required to demonstrate compliance with these emission limitations. However, should compliance with these emission limitations ever become suspect, then the permittee may be required to perform emission testing, employing all applicable USEPA test methods, to establish accurate and representative emission limitations for this emissions unit.

B. Operational Restrictions

1. All cabinet doors and openings of this emissions unit shall be closed at all times the emissions unit is in operation.

C. Monitoring and/or Recordkeeping Requirements

NONE

D. Reporting Requirements

NONE

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:

- a.** Emission Limitation: 10% opacity from any stack, as a 6-minute average

Applicable Compliance Method: If required, compliance shall be determined by visible emission evaluations performed in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(1).

- b.** Emission Limitation: 0.5 lb/hr and 2 tpy of PM

Applicable Compliance Method: The above emission limitations are based on material balance assumptions as shown in the following equation:

$E_h = (MU_{max}) - [(TE) \times (MU_{max})] - [(B) \times (MU_{max})]$; and

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$$E_y = (E_h) \times (8760 \text{ hours/year}) \times (1 \text{ ton}/2000 \text{ pounds})$$

Where,

$E_h = 0.5 \text{ lb/hr}$ of PM [hourly potential emissions];

$E_y = 2 \text{ tpy}$ of PM [yearly potential emissions];

$MU_{\text{max}} = 1.25 \text{ lbs/hr}$ of metallizing material usage [maximum design capacity];

$TE = 30\%$ or 0.3 [metallizing transfer efficiency on part]; and

$B = 30\%$ or 0.3 [pre-exhaust baffle capture efficiency].

F. 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 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.
2. This permit to install (PTI) supersedes all of the requirements of PTI 16-797 issued October 12, 1989.

NEW SOURCE REVIEW FORM B

PTI Number: 16-02074 Facility ID: 1677010998

FACILITY NAME Russell Products Co., Inc./Devalera Div.

FACILITY DESCRIPTION Modification to Existing Permit to Install CITY/TWP Akron
(Supersede) - Spray Booths to be Permitted Separately.

SIC CODE 3479 SCC CODE 4-02-999-98 EMISSIONS UNIT ID K001

EMISSIONS UNIT DESCRIPTION Booth #1 (A-Line) - miscellaneous metal parts coating line, including spray booth exhaust filters, HVLP spray guns, and flash-off oven

DATE INSTALLED N/A

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds				0.92	4.0
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
Enter Determination water-based coatings and exhaust filter elements

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? NO
 OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to containinants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? YES NO

IDENTIFY THE AIR CONTAMINANTS:

NEW SOURCE REVIEW FORM B

PTI Number: 16-02074

Facility ID: 1677010998

FACILITY NAME Russell Products Co., Inc./Devalera Div.

FACILITY DESCRIPTION Modification to Existing Permit to Install CITY/TWP Akron

Emissions Unit ID: P002

SIC CODE 3479

SCC CODE 4-02-999-98

EMISSIONS UNIT ID K002

EMISSIONS UNIT DESCRIPTION Booth #2 (A-Line) - miscellaneous metal parts coating line, including spray booth exhaust filters, HVLP spray guns, and cure oven

DATE INSTALLED N/A

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds				0.92	4.0
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination water-based coatings and exhaust filter elements

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? NO

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT?

\$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? YES NO

IDENTIFY THE AIR CONTAMINANTS:

NEW SOURCE REVIEW FORM B

PTI Number: 16-02074

Facility ID: 1677010998

FACILITY NAME Russell Products Co., Inc./Devalera Div.

FACILITY DESCRIPTION Modification to Existing Permit to Install CITY/TWP Akron

Emissions Unit ID: P002

SIC CODE 3479

SCC CODE 4-02-999-98

EMISSIONS UNIT ID K007

EMISSIONS UNIT DESCRIPTION Booth #4 (B-Line) - miscellaneous metal parts coating line, including spray booth exhaust filters, HVLP spray guns, and flash-off and cure ovens

DATE INSTALLED N/A

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds				0.92	4.0
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS?

NESHAP?

PSD?

OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination water-based coatings and exhaust filter elements

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? NO

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? YES NO

IDENTIFY THE AIR CONTAMINANTS:

NEW SC

PTI Num

FACILITY

Emissions Unit ID: **P002**

FACILITY DESCRIPTION Modification to Existing Permit to Install (Supersede) - Spray Booths to be Permitted Separately. CITY/TWP Akron

SIC CODE 3479 SCC CODE 4-02-999-98 EMISSIONS UNIT ID P002

EMISSIONS UNIT DESCRIPTION Booth #3 (B-Line) - stainless steel metallizing process, including electric arc spray guns, and cabinet baffle

DATE INSTALLED N/A

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter				0.5	2
PM ₁₀					
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination closed doors and openings

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? NO
OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to containinants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? YES NO

IDENTIFY THE AIR CONTAMINANTS: