



State of Ohio Environmental Protection Agency

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

CERTIFIED MAIL

Street Address:

50 West Town Street, Suite 700

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

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 16-02481

Fac ID: 1677011129

DATE: 1/30/2007

Russell Products Co FCS Division
Peggy Russell
275 N Forge St
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 of the Director is final 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 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
309 South Fourth Street, Room 222
Columbus, OH 43215

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA

ARAQMD



FINAL PERMIT TO INSTALL 16-02481

Application Number: 16-02481
Facility ID: 1677011129
Permit Fee: **\$400**
Name of Facility: Russell Products Co FCS Division
Person to Contact: Peggy Russell
Address: 275 N Forge St
Akron, OH 44304

Location of proposed air contaminant source(s) [emissions unit(s)]:
**275 N Forge St
Akron, Ohio**

Description of proposed emissions unit(s):
Two (2) Spray Booths.

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



Laura Powell
Acting 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

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 (i.e., postmarked) quarterly 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

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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 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)

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

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

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 Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

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.

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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 ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

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>
OCs	14.6

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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.

Operations, Property, and/or Equipment - (R005) - Booth 5 - coats urethane foam; coatings air dried; photochemically reactive materials, as defined by OAC rule 3745-21-01(C)(5), not used; spray booth exhaust fan dry filter elements catch paint overspray; and emissions of organic compounds (OCs) uncontrolled. Based upon the application, the potential to emit for this emissions unit is 6.18 tons per year of volatile organic compounds (VOCs), 2.32 tons per year of individual hazardous air pollutants (HAPs), and 3.12 tons per year of combined HAPs. Actual emissions for this emissions unit tentatively will not exceed 2.06 tons per year of VOCs, 0.77 ton per year of individual HAPs, and 1.04 tons per year of combined HAPs. Principal emitters of VOCs and HAPs at this facility include R001 through R006 (Booths 1 through 6) and a de minimis (per OAC rule 3745-15-05) paint cleanup station. The current synthetic minor strategy in place at the facility to maintain emissions of VOCs and HAPs below major source thresholds will not be compromised with the addition of R005 and R006.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)(b)	Employment of "best available technology" or "BAT", as defined by OAC rule 3745-31-01(T), is not a requirement since the emissions unit's potential to emit any air contaminant is less than 10 tons per year.
OAC rule 3745-21-07(G)(2)	On any day photochemically reactive materials (PRMs), as defined by OAC rule 3745-21-01(C)(5), are used OC emissions shall not exceed 8 pounds/hour & 40 pounds/day.

2. Additional Terms and Conditions

- 2.a The permittee shall apply for and, if required, obtain a final permit to install prior to equipment replacement or any proposed modification of equipment or production procedures, or any other change that would increase the potential emissions of any air pollutant.

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B. Operational Restrictions

1. The permittee shall employ properly installed and maintained spray booth exhaust fan dry 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 a designated operation separate from this emissions unit.
3. The permittee shall be restricted to coating only the types of parts and products specified in the application. No metal or other types of parts or products shall be coated in this emissions unit.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall document the following incidents each day for the line:
 - a. Spray booth exhaust fan dry filter elements not employed as required above in section B.1.
 - b. Cleanup performed in this emissions unit.
 - c. Coating metal or other types of parts or products not specified in the application.
2. The permittee shall collect and record the following information each day PRMs are used in the coating line:
 - a. The company identification of each coating, as applied after final formulation.
 - b. The number of gallons of each coating, as applied after final formulation.
 - c. The OC content of each coating, as applied after final formulation, in pounds of OCs/gallon of coating.
 - d. The total OC emissions from all coatings, as applied after final formulation, in pounds of OCs/day, i.e., $d = \text{sum } [b \times c]$ for all coatings.
 - e. The total hours of operation.
 - f. The average hourly OC emissions, in pounds of OCs/hour, i.e., $f = d/e$.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record detailing any of the incidents documented above in section C.1. 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 of the incident(s).
2. The permittee shall submit quarterly deviation (excursion) reports identifying each day PRMs are used during which the average hourly and/or daily OC emissions from the emissions unit exceeded, respectively, 8 pounds/hour & 40 pounds/day, and the actual average hourly and daily OC emissions for each such day.

The quarterly deviation reports shall be submitted to the Director (appropriate District Office or local air agency) in accordance with the General Terms and Conditions. These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter.

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: On any day photochemically reactive materials (PRMs), as defined by OAC rule 3745-21-01(C)(5), are used OC emissions shall not exceed 8 pounds/hour & 40 pounds/day.

Applicable Compliance Method: Compliance shall be demonstrated based upon the record keeping requirements of C.2 above.

2. In accordance with OAC rule 3745-21-04(B)(5), facilities located in Ashtabula, Butler, Clark, Clermont, Cuyahoga, Delaware, Franklin, Geauga, Greene, Hamilton, Lake, Licking, Lorain, Lucas, Mahoning, Medina, Miami, Montgomery, Portage, Stark, Summit, Trumbull, Warren and Wood Counties shall use USEPA Method 24 to determine the OC 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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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 pollutant will be less than 1.0 ton. OAC Chapter 3745-31 requires a permittee 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 a new permit to install application would be required for an emissions unit if changes in the composition of the materials or use of new materials would cause the emissions of any pollutant that has a listed Threshold Limit Value (TLV), as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices"), to increase to above 1.0 ton per year.

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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.

Operations, Property, and/or Equipment - (R006) - Booth 6 - coats urethane foam; coatings air dried; photochemically reactive materials, as defined by OAC rule 3745-21-01(C)(5), not used; spray booth exhaust fan dry filter elements catch paint overspray; and emissions of organic compounds (OCs) uncontrolled. Based upon the application, the potential to emit for this emissions unit is 6.18 tons per year of volatile organic compounds (VOCs), 2.32 tons per year of individual hazardous air pollutants (HAPs), and 3.12 tons per year of combined HAPs. Actual emissions for this emissions unit tentatively will not exceed 2.06 tons per year of VOCs, 0.77 ton per year of individual HAPs, and 1.04 tons per year of combined HAPs. Principal emitters of VOCs and HAPs at this facility include R001 through R006 (Booths 1 through 6) and a de minimis (per OAC rule 3745-15-05) paint cleanup station. The current synthetic minor strategy in place at the facility to maintain emissions of VOCs and HAPs below major source thresholds will not be compromised with the addition of R005 and R006.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)(b)	Employment of "best available technology" or "BAT", as defined by OAC rule 3745-31-01(T), is not a requirement since the emissions unit's potential to emit any air contaminant is less than 10 tons per year.
OAC rule 3745-21-07(G)(2)	On any day photochemically reactive materials (PRMs), as defined by OAC rule 3745-21-01(C)(5), are used OC emissions shall not exceed 8 pounds/hour & 40 pounds/day.

2. Additional Terms and Conditions

- 2.a The permittee shall apply for and, if required, obtain a final permit to install prior to equipment replacement or any proposed modification of equipment or production procedures, or any other change that would increase the potential emissions of any air pollutant.

B. Operational Restrictions

1. The permittee shall employ properly installed and maintained spray booth exhaust fan dry 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 a designated operation separate from this emissions unit.
3. The permittee shall be restricted to coating only the types of parts and products specified in the application. No metal or other types of parts or products shall be coated in this emissions unit.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall document the following incidents each day for the line:
 - a. Spray booth exhaust fan dry filter elements not employed as required above in section B.1.
 - b. Cleanup performed in this emissions unit.
 - c. Coating metal or other types of parts or products not specified in the application.
2. The permittee shall collect and record the following information each day PRMs are used in the coating line:
 - a. The company identification of each coating, as applied after final formulation.
 - b. The number of gallons of each coating, as applied after final formulation.
 - c. The OC content of each coating, as applied after final formulation, in pounds of OCs/gallon of coating.
 - d. The total OC emissions from all coatings, as applied after final formulation, in pounds of OCs/day, i.e., $d = \text{sum } [b \times c]$ for all coatings.
 - e. The total hours of operation.
 - f. The average hourly OC emissions, in pounds of OCs/hour, i.e., $f = d/e$.

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D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record detailing any of the incidents documented above in section C.1. 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 of the incident(s).
2. The permittee shall submit quarterly deviation (excursion) reports identifying each day PRMs are used during which the average hourly and/or daily OC emissions from the emissions unit exceeded, respectively, 8 pounds/hour & 40 pounds/day, and the actual average hourly and daily OC emissions for each such day.

The quarterly deviation reports shall be submitted to the Director (appropriate District Office or local air agency) in accordance with the General Terms and Conditions. These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter.

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: On any day photochemically reactive materials (PRMs), as defined by OAC rule 3745-21-01(C)(5), are used OC emissions shall not exceed 8 pounds/hour & 40 pounds/day.

Applicable Compliance Method: Compliance shall be demonstrated based upon the record keeping requirements of C.2 above.

2. In accordance with OAC rule 3745-21-04(B)(5), facilities located in Ashtabula, Butler, Clark, Clermont, Cuyahoga, Delaware, Franklin, Geauga, Greene, Hamilton, Lake, Licking, Lorain, Lucas, Mahoning, Medina, Miami, Montgomery, Portage, Stark, Summit, Trumbull, Warren and Wood Counties shall use USEPA Method 24 to determine the OC 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.

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 pollutant will be less than 1.0 ton. OAC Chapter 3745-31 requires a permittee 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 a new permit to install application would be required for an emissions unit if changes in the composition of the materials or use of new materials would cause the emissions of any pollutant that has a listed Threshold Limit Value (TLV), as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices"), to increase to above 1.0 ton per year.

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Emissions Unit ID: **R006**

SIC CODE 3086 SCC CODE 4-02-022-99 EMISSIONS UNIT ID R005

EMISSIONS UNIT DESCRIPTION Booth 5

DATE INSTALLED after pti issued

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				8 pounds/hour & 40 pounds/day	
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?

not applicable

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: _____

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Emissions Unit ID: **R006**

SIC CODE 3086 SCC CODE 4-02-022-99 EMISSIONS UNIT ID R006

EMISSIONS UNIT DESCRIPTION Booth 6

DATE INSTALLED after pti issued

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				8 pounds/hour & 40 pounds/day	
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?

not applicable

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: _____