Ohio Environmental Protection Agency

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

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
No	SYNTHETIC MINOR TO AVOID TITLE V
No	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

6/29/2016

Tobin Hawes
Henkel Corp
7405 Production Drive
Mentor, OH 44060

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1318597812
Permit Number: P0119079
Permit Type: Initial Installation
County: Cuyahoga

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

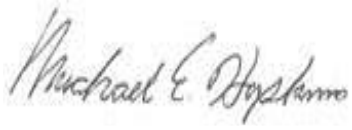
This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

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 Cleveland Division of Air Quality at (216)664-2297 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: CDAQ

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
Henkel Corp

Facility ID:	1318597812
Permit Number:	P0119079
Permit Type:	Initial Installation
Issued:	6/29/2016
Effective:	6/29/2016
Expiration:	6/29/2026

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
Henkel Corp

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Authorization

Facility ID: 1318597812
Application Number(s): A0052939, A0055166
Permit Number: P0119079
Permit Description: Initial PTIO for the following emissions units: B&P maintenance cleaning solvent and waste handling (P023); and nine mixers (P027 - P033, P037, and P038). The mixers are controlled with bag houses, and emissions unit P023 is uncontrolled.
Permit Type: Initial Installation
Permit Fee: $16,150.00
Issue Date: 6/29/2016
Effective Date: 6/29/2016
Expiration Date: 6/29/2026
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Henkel Corp
18731 CRANWOOD PKWY.
Warrensville Heights, OH 44128

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:

Cleveland Division of Air Quality
2nd Floor
75 Erieview Plaza
Cleveland, OH 44114
(216)664-2297

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: P0119079
Permit Description: Initial PTIO for the following emissions units: B&P maintenance cleaning solvent and waste handling (P023); and nine mixers (P027 - P033, P037, and P038). The mixers are controlled with bag houses, and emissions unit P023 is uncontrolled.

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

Emissions Unit ID:	**P023**
Company Equipment ID:	B&P and Maintenance Cleaning Solvent and waste handling
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P029**
Company Equipment ID:	Myers (DEDICATED BEADED WEARING HARDENER) 250 gallon mixer -
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P033**
Company Equipment ID:	Cowles (EPOXIES/ANTI-SEIZE) 55 gallon mixer
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P037**
Company Equipment ID:	Molteni (SILICONE) 250 gallon mixer
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P038**
Company Equipment ID:	Myers (SILICONE) 250 gallon mixer
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Group Name: Mixers / Donaldson

Emissions Unit ID:	**P027**
Company Equipment ID:	Myers (DEDICATED BEADED WEARING RESIN) 200 gallon mixer - Du
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P028**
Company Equipment ID:	Cowles (DEDICATED BACKING RESIN) 225 gallon mixer - Duro
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P030**
Company Equipment ID:	Myers (EPOXIES) 330 gallon mixer - Duro
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P031**
Company Equipment ID:	American Process (DEDICATED ANTI-SEIZE) 100 gallon mixer - D
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P032**
Company Equipment ID:	American Process (DEDICATED ANTI-SEIZE) 200 gallon mixer
Superseded Permit Number:	

General Permit Category andType:	Not Applicable

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 beingpermanently shut down without first applying for and obtaining a permit pursuantto 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.

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) None.

C. Emissions Unit Terms and Conditions

1. P023, B&P and Maintenance Cleaning Solvent and waste handling

Operations, Property and/or Equipment Description:

B&P and Maintenance Cleaning Solvent and waste handling

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. None.

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	Organic compound (OC) emissions shall not exceed 13.9 tons per year (tpy) from the B&P and maintenance cleaning solvent and waste handling.

(2) Additional Terms and Conditions

a. As used in this permit, Maintenance Cleaning Solvent means solvent materials used by the facility in the maintenance and cleaning of production equipment and/or resulting in emissions greater than de minimis quantities (>10 lbs/day), and specifically includes solvent materials known or referred to at the site as A8653 (*acetone and t-butyl acetate*) and PDM 1000 (*blend of aliphatic dimethyl esters, fatty methyl esters and surfacants*).

c) Operational Restrictions

(1) Except during times of active use including but not limited to addition, transfer and during cleaning use where the container is in close proximity to the equipment being serviced, the maintenance cleaning solvent, waste handling materials, and used shop towels shall be kept in closed containers at all times.

(2) Maintenance cleaning solvent and waste handling materials shall be conveyed from one location to another in closed containers, or by direct transfer through hoses or pipes.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information annually for the this emissions unit and shall maintain this information at the facility for a period of three years:

a. the name and identification of each virgin maintenance cleaning solvent purchased;

b. the OC content, in lbs OC/gallon, of each virgin maintenance cleaning solvent purchased;

c. the amount, in gallons, of each virgin maintenance cleaning solvent in the initial inventory ($INV_{INITIAL}$) at the beginning of the reporting year on January 1.

d. the amount, in gallons, of each virgin maintenance cleaning solvent purchased (*P*); and

e. the amount, in gallons, of waste maintenance cleaning solvent that is sent off site for disposal (*W*);

f. the amount, in gallon, of each virgin maintenance cleaning solvent remaining in inventory at the end of the reporting year (INV_{FINAL}) on December 31;

g. the total OC emissions from each B&P and Maintenance Cleaning Solvent and waste handling shall be calculated as:

[($INV_{INITIAL}$(gallons) x OC% x D (lbs/gallon)+(*P* (gallons) x OC% x *D* (lbs/gallon)) – INV_{FINAL}(gallons) x OC% x *D* (lbs/gallon) – (*W* (gallons) x OC% x *D* (lbs/gallon))] / 2000 lbs/ton

Sum the amount of emissions for each solvent to determine the total amount of emissions from all the cleaning solvents used for this emissions unit.

e) Reporting Requirements

(1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online portal; or they may be mailed as a hard copy to the Cleveland Division of Air Quality (Cleveland DAQ).

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Cleveland DAQ 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 1.b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

OC emissions from B&P and Maintenance Cleaning Solvent and waste handling processes shall not exceed 13.9 tons per year.

Applicable Compliance Method:

Compliance shall be determined by the recordkeeping requirements in 1.d)(1) above.

g) Miscellaneous Requirements

(1) Emission unit P023 was installed in 1999.

2. P029, Myers (BEADED WEARING HARDENER) 250 gallon mixer -

Operations, Property and/or Equipment Description:

Myers (resin) 250 gallon mixer – Duro room mixer controlled by DC-1 (large Donaldson dust collector).

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. None.

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.	3745-31-05(A)(3) June 30, 2008	Particulate emissions (PE) shall not exceed 2 lbs/day and 0.4 ton per year. Visible PE from the DC-1 stack serving this emissions unit shall not exceed 5% opacity, as a six-minute average. Visible emissions of fugitive dust shall not exceed 5% opacity, as a three-minute average. See 2.b)(2)a. below.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-31-05(A)(3)(a)(ii)	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE and VOC emissions from this emissions unit since the potential to emit is less than 10 tons/year for each pollutant. See 2.b)(2)b. below.
c.	OAC rule 3745-31-05(F)	PE shall not exceed 2 lbs/day and 0.4 ton per year. These emission limits shall apply after the SIP is approved per 2.b)(2)a. below.
d.	OAC rule 3745-17-07(A)	Visible PE from the DC-1 stack serving this emissions unit shall not exceed 20% opacity, as a six-minute average, except as specified by rule. This limit shall apply after the SIP is approved per 2.b)(2)a. below.
e.	OAC rule 3745-17-07(B)	Visible emissions of fugitive dust shall not exceed 20% opacity, as a three-minute average. This limit shall apply after the SIP is approved per 2.b)(2)a. below.
f.	OAC rule 3745-17-08(B)	Reasonably available control measures (RACM) shall be employed to sufficiently minimize or eliminate visible emissions of fugitive dust. See 2.b)(2)c. and c)(1) below.
g.	OAC rule 3745-17-11(B)	The particulate emission limitation specified by this rule is less stringent than the particulate emission limit established pursuant to OAC rules 3745-31-05(A)(3) and 31-05(F).

(2) Additional Terms and Conditions

a. This Best Available Technology (BAT) emission limit applies until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the

less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).

b. These requirements apply once U.S EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.

c. The permittee shall employ reasonably available control measures that shall include, but not be limited to, the installation and use of hoods, fans, and /or other equipment to adequately enclose, contain, capture, vent, and control fugitive dust from this emissions unit and shall meet the following requirements:

i. the collection efficiency shall be sufficient to minimize or eliminate visible emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.

d. The requirements of OAC rule 3745-21-07(M)(2) do not apply because this emissions unit is not equipped with a VOC control device.

c) Operational Restrictions

(1) The emissions from this emissions unit shall be vented to DC-1 (large Donaldson dust collector) at all times when raw material additions are made to the mixing tank or sampling is occurring.

(2) In order to maintain compliance with the applicable emissions limitations contained in this permit, the acceptable range established for the pressure drop across the baghouse is between 2 and 6 inches of water.

(3) This emissions unit shall be equipped with a cover that completely covers the tank opening except for an opening no larger than necessary to allow for safe clearance of the mixing shaft.

(4) The emissions unit shall be kept covered at all times except when production, sampling, inspection and cleaning procedures require access.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain daily records that document any time periods when the dust collector serving this emissions unit was not in service while raw material additions were being made to the mixing tank.

(2) The permittee shall properly install, operate and maintain equipment to continuously monitor the pressure drop, in inches of water, across DC-1 when raw material additions are made to the mixing tank. The permittee shall record the pressure drop across DC-1 on a daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop across DC-1 deviates from the limit or range established in accordance with this permit, the permittee shall promptly

investigate the cause of such deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began:

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations;

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date the corrective action was completed;

h. the date and time the deviation ended:

i. the total period of time in(in minutes) during which there was a deviation;

j. the pressure drop readings immediately after the corrective action was implemented; and

k. the names(s) of the personnel who performed the work.

Investigations and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

This range or limit on the pressure drop across DC-1 is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Cleveland Division of Air Quality (Cleveland DAQ). The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrates compliance with the allowable particulate emission rate for the controlled emission unit. In addition, approved revisions to the range or limit will constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

e) Reporting Requirements

(1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the Cleveland Division of Air Quality (Cleveland DAQ).

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Cleveland DAQ by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

(3) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of DC-1 during the 12-month reporting period for thisemissions unit:

a. each period of time (start time and date, and end time and date)when the pressure drop across DC-1 was outside of the acceptable range;

b. any period of time (start time and date, and end time and date)when raw materials were added to the mixing tank, and the process emissions were not vented to DC-1;

c. each incident of deviation described in “a” (above) where a prompt investigation was not conducted;

d. each incident of deviation described in “a” where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. each incident of deviation described in “a” where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in 2.b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Particulate emissions (PE) shall not exceed 2 lbs PE/day and 0.4 ton/year

Applicable Compliance Method:

Compliance with the daily and annual PE emission limits may be demonstrated using the calculation below.

The maximum controlled potential to emit PE emission rate in pounds per day and ton/year is determined by the following calculations:

(250 gals/batch) x (2 batches/day) x (19.5 lbs/gal) x 0.737 (% Solids) x (0.003 lb PE/lb material) x (1 – 0.99) = 0.22 lb PE/day

The emission factor was determined from mass balance data provided by the permittee.

Including a cushion for the allowable limit, the controlled emission limit is 2 lbs PE/day.

(2 lbs PE/day) x (365 days/year) x (ton/2000 lbs) = 0.4 ton PE/year

b. Emission Limitation:

Visible PE from the DC-1 stack serving this emissions unit shall not exceed 5% opacity, as a six-minute average.

Applicable Compliance Method:

If required, compliance with the visible emissions limitation shall be determined through visible emissions observations from the DC-1 stack performed in accordance with U.S. EPA Method 9.

c. Emission Limitation:

Visible emissions of fugitive dust shall not exceed 5% opacity, as a three-minute average.

Applicable Compliance Method:

If required, compliance with the limitation for visible emissions of fugitive dust shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3). The points of observation shall be the non-stack egress points (e.g., windows, doors, roof monitors) serving this emissions unit.

d. Emission Limitation:

Visible PE from the DC-1 stack serving this emissions unit shall not exceed 20% opacity, as a six-minute average.

This limit shall apply after the SIP is approved per 2.b)(2)a. above.

Applicable Compliance Method:

If required, compliance with the visible emissions limitation shall be determined through visible emissions observations from the DC-1 stack performed in accordance with U.S. EPA Method 9.

e. Emission Limitation:

Visible emissions of fugitive dust shall not exceed 20% opacity, as a three-minute average.

This limit shall apply after the SIP is approved per 2.b)(2)a. above.

Applicable Compliance Method:

If required, compliance with the limitation for visible emissions of fugitive dust shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3). The points of observation shall be the non-stack egress points (e.g., windows, doors, roof monitors) serving this emissions unit.

g) Miscellaneous Requirements

(1) Emissions unit P029 was installed in November 2007.

(2) The maximum uncontrolled potential VOC emission rate from this emission unit is less than 0.5 ton/year; therefore, a VOC emission limit has not been established. The maximum uncontrolled potential to emit was determined as follows:

(250 gals/batch) x (1.7 batches/day) x (19.5 lbs/gal) x 0.01 (% VOCs) x 0.02 (2% EF) = 1.7 lbs VOC/day

(1.7 lbs VOC/day) x (365 days/yr) x (1 ton/2000 lbs) = 0.31 ton/year VOC

3. P033, Cowles (EPOXIES/ANTI-SEIZE) 55 gallon mixer

Operations, Property and/or Equipment Description:

Cowles (epoxies/anti-seize) 55 gallon mixer – Duro room mixer controlled by DC-1 (large Donaldson dust collector)

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. None.

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) June 30, 2008	Particulate emissions (PE) shall not exceed 2 lbs/day and 0.4 ton/year. Volatile organic compound (VOC) emissions shall not exceed 9.8 lbs/day and 1.8 tons/year. Visible PE from the DC-1 stack serving this emissions unit shall not exceed 5% opacity, as a six-minute average. Visible emissions of fugitive dust shall not exceed 5% opacity, as a three-minute average.
b.	OAC rule 3745-17-07(A)	The visible particulate opacity limit specified by this rule is less stringent than the visible particulate opacity limit

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		established pursuant to OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-17-07(B)	The visible emission of fugitive dust opacity limit specified by this rule is less stringent than the visible emission of fugitive dust opacity limit established pursuant to OAC rule 3745-31-05(A)(3).
d.	OAC rule 3745-17-08(B)	Reasonably available control measures (RACM) shall be employed to sufficiently minimize or eliminate visible emissions of fugitive dust. See 3.b)(2)a. and c)(1) below.
e.	OAC rule 3745-17-11(B)	The particulate emission limit specified by this rule is less stringent than the particulate emission limit established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

a. The permittee shall employ reasonably available control measures that shall include, but not be limited to, the installation and use of hoods, fans, and/or other equipment to adequately enclose, contain, capture, vent, and control fugitive dust from this emissions unit and shall meet the following requirements:

i. The collection efficiency shall be sufficient to minimize or eliminate visible emissions of fugitive dust and the point(s) of capture to the extent possible with good engineering design.

b. The requirements of OAC rule 3745-21-07(M)(2) do not apply because this emissions unit is not equipped with a VOC control device.

c) Operational Restrictions

(1) The emissions from this emissions unit shall be vented to DC-1 (large Donaldson dust collector) at all times when raw material additions are made to the mixing tank or sampling is occurring.

(2) In order to maintain compliance with the applicable emissions limitations contained in this permit, the acceptable range established for the pressure drop across the baghouse is between 2 and 6 inches of water.

(3) The emissions unit shall be equipped with a cover that completely covers the tank opening except for an opening no larger than necessary to allow for safe clearance of the mixing shaft.

(4) The emissions unit shall be kept covered at all times except when production, sampling, inspection and cleaning procedures require access.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain daily records that document any time periods when the dust collector serving this emissions unit was not in service while raw material additions were being made to the mixing tank.

(2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across DC-1 when raw material additions are made to the mixing tank. The permittee shall record the pressure drop across DC-1 on a daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop across DC-1 deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of such deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began:

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the names(s) of the personnel who conducted the investigation; and

e. the findings and recommendations;

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date the corrective action was completed;

h. the date and time the deviation ended:

i. the total period of time (in minutes) during which there was a deviation;

j. the pressure drop readings immediately after the corrective action was implemented; and

k. the names(s) of the personnel who performed the work.

Investigations and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

This range or limit on the pressure drop across DC-1 is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Cleveland Division of Air Quality (Cleveland DAQ). The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrates compliance with the allowable particulate emission rate for the controlled emissions until. In addition, approved revisions to the range or limit will constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

e) Reporting Requirements

(1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the Cleveland Division of Air Quality (Cleveland DAQ).

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Cleveland DAQ by the due date identified in the Authorization section of this permit. The PER shall covered a reporting period of not more than twelve months for each air contaminant source identified in this permit.

(3) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of DC-1 during the 12-month reporting period for this/these emissions unit(s):

a. each period of time (start time and date, and end time and date)when the pressure drop across DC-1 was outside of the acceptable range;

b. any period of time (start time and date, and end time and date)when raw material additions were made to the mixing tank and the process emissions were not vented to DC-1;

c. each incident of deviation described in "a" (above) where a prompt investigation was not conducted;

d. each incident of deviation described in "a" where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. each incident of deviation described in "a" where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in 3.b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Particulate emissions shall not exceed 2 lbs PE/day and 0.4 ton/year

Applicable Compliance Method:

Compliance with the daily and annual PE emission limits may be demonstrated using the calculations below.

The maximum controlled potential to emit PE emission rate in pounds per day and ton/year is determined by the following calculations:

(55 gals/batch) x (11 batches/day) x (16.4 lbs/gal) x 0.426 (% Solids) x (0.003 lb PE/lb material) x (1 – 0.99) = 0.12 lb PE/day

The emission factor was determined from mass balance data provided by the permittee.

Including a cushion for the allowable limit, the controlled emission limit is 2 lbs PE/day.

(2 lbs PE/day) x (365 days/year) x (ton/2000 lbs) = 0.4 ton PE/year

b. Emission Limitation:

VOC emissions shall not exceed 9.8 lbs/day and 1.8 tons/year.

Applicable Compliance Method:

Compliance with the daily and annual emission limits may be demonstrated using the following calculations at maximum potential to emit:(55 gals/batch) x (10.7 batches/day) x (16.4 lbs/gal) x 0.0508 (% VOCs) x 0.02 (2% EF) = 9.8 lbs VOC/day

(9.8 lbs VOC/day) x (365 days/yr) x (1 ton/2000 lbs) = 1.8 TPY VOC

c. Emission Limitation:

Visible PE from the DC-1 stack serving this emissions unit shall not exceed 5% opacity, as a six-minute average.

Applicable Compliance Method:

If required, compliance with the visible emissions limitation shall be determined through visible emissions observations from the DC-1 stack performed in accordance with U.S. EPA Method 9.

d. Emission Limitation:

Visible emissions of fugitive dust shall not exceed 5% opacity, as a three-minute average.

Applicable Compliance Method:

If required, compliance with the limitation for visible emissions of fugitive dust shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3). The points of observation shall be the non-stack egress points (e.g., windows, doors, roof monitors) serving this emissions unit.

g) Miscellaneous Requirements

(1) Emissions unit P033 was installed in 2000.

4. P037, Molteni (SILICONE) 250 gallon mixer

Operations, Property and/or Equipment Description:

Molteni250 gallon mixer – Silicone room mixer controlled by the American Air Filter dust collector (DC-4 AAF 2 - located behind Clover room).

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. None.

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) June 30, 2008	Particulate emissions (PE) shall not exceed 2 lbs/day and 0.4 ton/year. Volatile organic compound (VOC) emissions shall not exceed 3 lbs/day and 0.55 ton/year. Visible PE from the DC-4 AAF 2 stack serving this emission unit shall not exceed 5% opacity, as a six-minute average. Visible emissions of fugitive dust shall not exceed 5% opacity, as a three-minute average.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-17-07(A)	The visible particulate opacity limit specified by this rule is less stringent than the visible particulate opacity limit established pursuant to OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-17-07(B)	The visible emission of fugitive dust opacity limit specified by this rule is less stringent than the visible emission of fugitive dust opacity limit established pursuant to OAC rule 3745-31-05(A)(3).
d.	OAC rule 3745-17-08(B)	Reasonably available control measures (RACM) shall be employed to sufficiently minimize or eliminate visible emissions of fugitive dust. See 4.b)(2)a. and c)(1) below.
e.	OAC rule 3745-17-11(B)	The particulate emission limit specified by this rule is less stringent than the particulate emission limit established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

a. The permittee shall employ reasonably available control measures that shall include, but not be limited to, the installation and use of hoods, fans, and/or other equipment to adequately enclose, contain, capture, vent, and control fugitive dust from this emissions unit and shall meet the following requirements:

i. the collection efficiency shall be sufficient to minimize or eliminate visible emissions of fugitive dust and the point(s) of capture to the extent possible with good engineering design.

b. The requirements of OAC rule 3745-21-07(M)(2) do not apply because this emissions unit is not equipped with a VOC control device.

c) Operational Restrictions

(1) The emissions from this emissions unit shall be vented to DC-4 AAF 2(American Air Filter dust collector) at all times when raw material additions are made to the mixing tank or sampling is occurring.

(2) In order to maintain compliance with the applicable emissions limitations contained in this permit, the acceptable range established for the pressure drop across the baghouse is between 3 and 6 inches of water.

(3) The emissions unit shall be equipped with a cover that completely covers the tank opening except for an opening no larger than necessary to allow for safe clearance of the mixing shaft.

(4) The emissions unit shall be kept covered at all times except when production, sampling, inspection and cleaning procedures require access.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain daily records that document any time periods when DC-4 AAF 2 serving this emissions unit was not in service while raw material additions were being made to the mixing tank.

(2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop in inches of water, across DC-4 AAF 2 when raw material additions are made to the mixing tank. The permittee shall record the pressure drop across DC-4 AAF 2 on a daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop across DC-4 AAF 2 deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of such deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began:

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the names(s) of personnel who conducted the investigation; and

e. the findings and recommendations;

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action ;

g. the date the corrective action was completed;

h. the date and time the deviation ended:

i. the total period of time(in minutes) during which there was a deviation;

j. the pressure drop readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

Investigations and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

This range or limit on the pressure drop across DC-4 AAF 2 is effective for the duration of this permit unless revisions are requested by the permittee and approved in writing by the Cleveland Division of Air Quality (Cleveland DAQ). The permittee may request revisions to the permitted limit or range for the pressure drop based upon the information obtained during future testing that demonstrates compliance with the allowable particulate emission rate for the controlled emissions unit. In addition, approved revisions to the range or limit will constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

e) Reporting Requirements:

(1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the Cleveland Division of Air Quality (Cleveland DAQ).

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Cleveland DAQ by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

(3) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of DC-4 AAF 2 during the 12-month reporting period for this/these emissions unit(s):

a. each period of time (start time and date, and end time and date)when the pressure drop across DC-4 AAF 2 was outside of the acceptable range;

b. any period of time (start time and date, and end time and date)when raw material additions were made to the mixing tank and the process emissions were not vented to DC-4 AAF 2;

c. each incident of deviation described in "a" (above) where a prompt investigation was not conducted;

d. each incident of deviation described in "a" where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. eachincident of deviation described in "a" where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in 4.b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Particulate emissions shall not exceed 2 lbs PE/day and 0.4 ton/year

Applicable Compliance Method:

Compliance with the daily and annual PE emission limits may be demonstrated using the calculations below.

The maximum controlled potential to emit PE emission rate in pounds per day and ton/year is determined by the following calculations:

(250 gals/batch) x (3 batches/day) x (11.7 lbs/gal) x 0.685 (% Solids) x (0.004 lb PE/lb material) x (1 – 0.99) = 0.24 lb PE/day

The emission factor was determined from mass balance data provided by the permittee.

Including a cushion for the allowable limit, the controlled emission limit is 2 lbs PE/day.

(2 lbs PE/day) x (365 days/year) x (ton/2000 lbs) = 0.4 ton PE/year

b. Emission Limitation:

VOC emissions shall not exceed 3 lbs/day and 0.55 ton/year.

Applicable Compliance Method:

Compliance with the daily and annual VOC emission limits may be demonstrated using the following calculations at maximum potential to emit:

(250 gals/batch) x (2.9 batches/day) x (11.7 lbs/gal) x 0.0174 (% VOCs) x 0.02 (2% EF) = 3.0 lbs VOC/day

(3.0 lbs VOC/day) x (365 days/yr) x (1 ton/2000 lbs) = 0.55 TPY VOC

c. Emission Limitation:

Visible PE from the DC-4 AAF 2 stack serving this emissions unit shall not exceed 5% opacity, as a six-minute average.

Applicable Compliance Method:

If required, compliance with the visible emissions limitation shall be determined through visible emissions observations at the DC-4 AAF 2 stack performed in accordance with U.S. EPA Method 9.

d. Emission Limitation:

Visible emissions of fugitive dust shall not exceed 5% opacity, as a three-minute average.

Applicable Compliance Method:

If required, compliance with the limitation for visible emissions of fugitive dust shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3). The points of observation shall be the non-stack egress points (e.g., windows, doors, roof monitors) serving this emissions unit.

g) Miscellaneous Requirements

(1) Emissions unit P037 was installed in 1998.

5. P038, Myers (SILICONE) 250 gallon mixer

Operations, Property and/or Equipment Description:

Myers 250 gallon mixer – SMP room (formerly UV/EB) mixer controlled by DC-3 (small Donaldson dust collector).

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. None.

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) June 30, 2008	Particulate emissions (PE) shall not exceed 0.03 ton per month averaged over a 12-month rolling period. Volatile organic compound (VOC) emissions shall not exceed 0.046 ton per month averaged over a 12-month rolling period. See 5.b)(2)a. below.
b.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE and VOC emissions from this emissions unit since the potential to emit is less than 10 tons/year for each pollutant.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See 5.b)(2)b. below.
c.	OAC rule 3745-31-05(F)	Particulate emissions (PE) shall not exceed 2 lbs/day and 0.4 tons per year. Volatile organic compound (VOC) emissions shall not exceed 3 lbs/day and 0.55 ton/year. These emission limits shall apply after the SIP is approved per 5.b)(2)a. below.
d.	OAC rule 3745-31-17-07(A)	Visible PE from DC-3 the stack serving this emissions unit shall not exceed 20% opacity, as a six-minute average.
e.	OAC rule 3745-31-17-07(B)	Visible emissions of fugitive dust shall not exceed 20% opacity, as a three-minute average.
f.	OAC rule 3745-31-17-08(B)	Reasonably available control measures (RACM) shall be employed to sufficiently minimize or eliminate visible emissions of fugitive dust. See 5.b)(2)c. and c)(1) below.
g.	OAC rule 3745-31-17-11(B)	The particulate emission limit specified by this rule is less stringent than the particulate emission limit established pursuant to OAC rule 3745-31-05(A)(3) and 3745-31-05(F).

(2) Additional Terms and Conditions

a. This Best Available Technology (BAT) emission limit applies until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).

b. These requirements apply once U.S EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.

c. The permittee shall employ reasonably available control measures that shall include, but not be limited to, the installation and use of hoods, fans, and /or

other equipment to adequately enclose, contain, capture, vent, and control fugitive dust from this emissions unit and shall meet the following requirements:

i. the collection efficiency shall be sufficient to minimize or eliminate visible emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.

d. The requirements of OAC rule 3745-21-07(M)(2) do not apply because this emissions unit was installed after February 18, 2008.

c) Operational Restrictions

(1) The emissions from this emissions unit shall be vented to DC-3(small Donaldson dust collector) at all times when raw material additions are made to the mixing tank or sampling is occurring.

(2) In order to maintain compliance with the applicable emissions limitations contained in this permit, the acceptable range established for the pressure drop across DC-3 is between 2 and 6 inches of water.

(3) The emissions unit shall be equipped with a cover that completely covers the tank opening except for an opening no larger than necessary to allow for safe clearance of the mixing shaft.

(4) The emissions unit shall be kept covered at all times except when production, sampling, inspection and cleaning procedures require access.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain daily records that document any time periods when DC-3 serving this emissions unit was not in service while raw material additions were being made to the mixing tank.

(2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across DC-3 when raw material additions are made to the mixing tank. The permittee shall record the pressure drop across DC-3 on a daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop across DC-3 deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of such deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began:

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the names(s) of the personnel who conducted the investigation; and

e. the findings and recommendations;

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date the corrective action was completed;

h. the date and time the deviation ended:

i. the total period of time (in minutes) during which there was a deviation;

j. the pressure drop readings immediately after the corrective action was implemented; and

k. the names(s) of the personnel who performed the work.

Investigations and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

This range or limit on the pressure drop across DC-3 is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Cleveland Division of Air Quality (Cleveland DAQ). The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrates compliance with the allowable particulate emission rate for the controlled emissions until. In addition, approved revisions to the range or limit will constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

e) Reporting Requirements

(1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the Cleveland Division of Air Quality (Cleveland DAQ).

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Cleveland DAQ by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of not more than twelve months for each air contaminant source identified in this permit and shall include any exceedance of the monthly 12-month rolling limit(s).

(3) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of DC-3 during the 12-month reporting period for this/these emissions unit(s):

a. each period of time (start time and date, and end time and date)when the pressure drop across DC-3 was outside of the acceptable range;

b. any period of time (start time and date, and end time and date)when raw material additions were made to the mixing tank and the process emissions were not vented to DC-3;

c. each incident of deviation described in "a" (above) where a prompt investigation was not conducted;

d. each incident of deviation described in "a" where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. each incident of deviation described in "a" where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in 5.b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Particulate emissions (PE) shall not exceed 0.03 ton per month averaged over a 12-month rolling period.

Applicable Compliance Method:

Compliance with the daily and annual PE emission limits may be demonstrated using the calculations below.

The particulate emission limit was established at the maximum controlled potential to emit as follows:

(250 gals/batch) x (3 batches/day) x (11.7 lbs/gal) x 0.5545 (% Solids) x (0.003 lb PE/lb material) x (1 – 0.99) = 0.145 lb PE/day

The emission factor was determined from mass balance data provided by the permittee.

Including a cushion for the allowable limit, the controlled emission limit is 2 lbs PE/day.

(2 lbs PE/day) x (365 days/year) x (ton/2000 lbs) = 0.4 ton PE/year

(0.4 ton PE/year) x (year/12 months) = 0.03 ton/month average over 12 months

b. Emission Limitation:

Volatile organic compound (VOC) emissions shall not exceed 0.046 ton per month averaged over a 12-month rolling period.

Applicable Compliance Method:

Compliance with the ton per month averaged over a 12-month rolling period may be demonstrated using the following calculations at potential to emit: .

(250 gals/batch) x (2.9 batches/day) x (11.7 lbs/gal) x 0.0174 (% VOCs) x 0.02 (2% EF) = 3.0 lbs VOC/day

(3.0 lbs VOC/day) x (365 days/yr) x (1 ton/2000 lbs) = 0.55 TPY VOC

(0.55 ton VOC/year) x (year/12 months) = 0.046 ton/month average over 12 months

c. Emission Limitation:

Particulate emissions (PE) shall not exceed 2 lbs/day and 0.4 ton/year.

These emission limits shall apply after the SIP is approved per 5.b)(2)a. above.

Applicable Compliance Method:

Compliance with the daily and annual PE emission limits may be demonstrated using the calculations below.

The particulate emission limit was established at the maximum controlled potential to emit as follows:

(250 gals/batch) x (3 batches/day) x (11.7 lbs/gal) x 0.5545 (% Solids) x (0.003 lb PE/lb material) x (1 – 0.99) = 0.145 lb PE/day

The emission factor was determined from mass balance data provided by the permittee.

Including a cushion for the allowable limit, the controlled emission limit is 2 lbs PE/day.

(2 lbs PE/day) x (365 days/year) x (ton/2000 lbs) = 0.4 ton PE/year

d. Emission Limitation:

Volatile organic compound (VOC) emissions shall not exceed 3 lbs/day and 0.55 ton/year.

These emission limits shall apply after the SIP is approved per 5.b)(2)a. above.

Applicable Compliance Method:

Compliance with the daily and annual VOC emission limits may be demonstrated using the following calculations at potential to emit;

(250 gals/batch) x (2.9 batches/day) x (11.7 lbs/gal) x 0.0174 (% VOCs) x 0.02 (2% EF) = 3.0 lbs VOC/day

(3.0 lbs VOC/day) x (365 days/yr) x (1 ton/2000 lbs) = 0.55 TPY VOC

e. Emission Limitation:

Visible PE from the DC-3 stack serving this emissions unit shall not exceed 20% opacity, as a six-minute average.

Applicable Compliance Method:

If required, compliance with the visible emissions limitation shall be determined through visible emissions observations of the DC-3 stack performed in accordance with U.S. EPA Method 9.

f. Emission Limitation:

Visible emissions of fugitive dust shall not exceed 20% opacity, as a three-minute average.

Applicable Compliance Method:

If required, compliance with the limitation for visible emissions of fugitive dust shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3). The points of observation shall be the non-stack egress points (e.g., windows, doors, roof monitors) serving this emissions unit.

g) Miscellaneous Requirements

(1) Emissions unit P038 was installed in 2013.

6. Emissions Unit Group -Mixers / Donaldson: P027,P028,P030,P031,P032,

EU ID	Operations, Property and/or Equipment Description
P027	Myers (epoxy) 200 gallon mixer –Duro room mixer controlled by DC-1 (large Donaldson dust collector).
P028	Cowles (dedicated backing resin) 225 gallon mixer - Duro room mixer controlled by DC-1 (large Donaldson dust collector).
P030	Myers (epoxies) 330 gallon mixer –Duro room mixer controlled by DC-1 (large Donaldson dust collector).
P031	American Process (dedicated anti-seize) 100 gallon mixer –Duro room mixer controlled by DC-1 (large Donaldson dust collector).
P032	American Process (dedicated anti-seize) 200 gallon mixer –Duro room mixer controlled by DC-1 (large Donaldson dust collector).

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. None.

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) June 30, 2008	Particulate emissions (PE) shall not exceed 2 lbs/day and 0.4 ton per year. Visible PE from the DC-1 stack serving this emissions unit shall not exceed 5% opacity, as a six-minute average. Visible emissions of fugitive dust shall not exceed 5% opacity, as a three-minute average.
b.	OAC rule 3745-17-07(A)	The visible particulate opacity limit specified by this rule is less stringent than the visible particulate opacity limit established pursuant to OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-17-07(B)	The visible emission of fugitive dust opacity limit specified by this rule is less stringent than the visible emission of fugitive dust opacity limit established pursuant to OAC rule 3745-31-05(A)(3).
d.	OAC rule 3745-17-08(B)	Reasonably available control measures (RACM) shall be employed to sufficiently minimize or eliminate visible emissions of fugitive dust. See 6.b)(2)a. and c)(1) below.
e.	OAC rule 3745-17-11(B)	The particulate emission limit specified by this rule is less stringent than the particulate emission limit established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

a. The permittee shall employ reasonably available control measures that shall include, but not be limited to, the installation and use of hoods, fans, and/or other equipment to adequately enclose, contain, capture, vent, and control fugitive dust from this emissions unit and shall meet the following requirements:

i. the collection efficiency shall be sufficient to minimize or eliminate visible emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.

b. The requirements of OAC rule 3745-21-07(M)(2) do not apply because these emissions units are not equipped with a VOC control device.

c) Operational Restrictions

(1) The emissions from these emissions units shall be vented to DC-1 (large Donaldson dust collector) at all times when raw material additions are made to the mixing tanks or sampling is occurring.

(2) In order to maintain compliance with the applicable emissions limitations contained in this permit, the acceptable range established for the pressure drop across DC-1 is between 2 and 6 inches of water.

(3) These mixers shall be equipped with a cover that completely covers the tank opening except for an opening no larger than necessary to allow for safe clearance of the mixing shaft.

(4) These mixers shall be kept covered at all times except when production, sampling, inspection or cleaning procedures require access.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain daily records that document any time periods when DC-1 was not in service while raw material additions were being made to the mixing tank.

(2) The permittee shall properly install, operate and maintain equipment to continuously monitor the pressure drop, in inches of water, across DC-1 when raw material additions are being made to the mixing tank. The permittee shall record the pressure drop across DC-1 on a daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop across DC-1 deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of such deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations;

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee

determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date the corrective action was completed;

h. the date and time the deviation ended:

i. the total period of time in(in minutes) during which there was a deviation;

j. the pressure drop readings immediately after the corrective action was implemented; and

k. the names(s) of the personnel who performed the work.

Investigations and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

This range or limit on the pressure drop across DC-1 is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Cleveland Division of Air Quality (Cleveland DAQ). The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrates compliance with the allowable particulate emission rate for the controlled emissions unit. In addition, approved revisions to the range or limit will constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

e) Reporting Requirements

(1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the Cleveland Division of Air Quality (Cleveland DAQ).

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Cleveland DAQ by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

(3) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of DC-1 during the 12-month reporting period for this/these emissions unit(s):

a. each period of time (start time and date, and end time and date)when the pressure drop across DC-1 was outside of the acceptable range;

b. any period of time (start time and date, and end time and date)when raw material additions were made to the mixing tank and the process emissions were not vented to DC-1;

c. each incident of deviation described in "a" (above) where a prompt investigation was not conducted;

d. each incident of deviation described in "a" where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. each incident of deviation described in "a" where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in 6.b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Particulate emissions shall not exceed 2 lbs PE/day and 0.4 ton/year.

Applicable Compliance Method:

Compliance with the daily and annual PE emission limits may be demonstrated using the calculations below.

The maximum controlled potential to emit PE emission rate in pounds per day and ton/year is determined by the following calculations (for the worst case emissions unit P030 with the highest emissions):

(330 gals/batch) x (2 batches/day) x (20.2 lbs/gal) x 0.815 (% Solids) x (0.003 lb PE/lb material) x (1 – 0.99) = 0.32 lb PE/day

The emission factor was determined from mass balance data provided by the permittee.

Including a cushion for the allowable limit, the controlled emission limit is 2 lbs PE/day.

(2 lbs PE/day) x (365 days/year) x (ton/2000 lbs) = 0.4 ton PE/year

b. Emission Limitation:

Visible PE from the DC-1 stack serving this emissions unit shall not exceed 5% opacity, as a six-minute average.

Applicable Compliance Method:

If required, compliance with the visible emissions limitation shall be determined through visible emissions observations of the DC-1 stack performed in accordance with U.S. EPA Method 9.

c. Emission Limitation:

Visible emissions of fugitive dust shall not exceed 5% opacity, as a three-minute average.

Applicable Compliance Method:

If required, compliance with the limitation for visible emissions of fugitive dust shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3). The points of observation shall be the non-stack egress points (e.g., windows, doors, roof monitors) serving this emissions unit.

g) Miscellaneous Requirements

(1) These emissions units were installed at the following times:

P027 – 2001; P028 – 2001; P030 – 2005; P031 – 2000; P032 – 2000

(2) The maximum uncontrolled potential VOC emission rate from each of these emissions units is less than 0.5 ton/year; therefore, a VOC emission limit has not been established. The maximum uncontrolled potential to emit VOC emission rate was determined as follows (for the worst case emissions unit P030 with the highest emission rate):

(330 gals/batch) x (1.7 batches/day) x (20.2 lbs/gal) x 0.001 (% VOCs) x 0.02 (2% EF) = 0.23 lb VOC/day

(0.23 lb VOC/day) x (365 days/yr) x (1 ton/2000 lbs) = 0.042 ton/year VOC