



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

9/14/2016

Certified Mail

Andy Blair
FALLS FILTRATION TECHNOLOGIES INC
115 East Steels Corners Road
Stow, OH 44224

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

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 1677050159
Permit Number: P0121380
Permit Type: Renewal
County: Summit

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 Akron Regional Air Quality Management District at (330)375-2480 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: ARAQMD



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
FALLS FILTRATION TECHNOLOGIES INC**

Facility ID:	1677050159
Permit Number:	P0121380
Permit Type:	Renewal
Issued:	9/14/2016
Effective:	9/14/2016
Expiration:	9/14/2026



Division of Air Pollution Control
Permit-to-Install and Operate
for
FALLS FILTRATION TECHNOLOGIES INC

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Final Permit-to-Install and Operate
FALLS FILTRATION TECHNOLOGIES INC
Permit Number: P0121380
Facility ID: 1677050159
Effective Date: 9/14/2016

Authorization

Facility ID: 1677050159
Application Number(s): A0056555
Permit Number: P0121380
Permit Description: Renewal Permit to Install and Operate for a spray paint booth (K002) and an adhesive coating line (R001).
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 9/14/2016
Effective Date: 9/14/2016
Expiration Date: 9/14/2026
Permit Evaluation Report (PER) Annual Date: July 1 - June 30, Due Aug 15

This document constitutes issuance to:

FALLS FILTRATION TECHNOLOGIES INC
115 EAST STEELS CORNERS ROAD
CUYAHOGA FALLS, OH 44224-0459

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:

Akron Regional Air Quality Management District
1867 West Market St.
Akron, OH 44313
(330)375-2480

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: P0121380

Permit Description: Renewal Permit to Install and Operate for a spray paint booth (K002) and an adhesive coating line (R001).

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

Emissions Unit ID:	K002
Company Equipment ID:	Binks Paint Booth
Superseded Permit Number:	16-02480
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	R001
Company Equipment ID:	Adhesive Application
Superseded Permit Number:	16-1364
General Permit Category and Type:	Not Applicable



Final Permit-to-Install and Operate
FALLS FILTRATION TECHNOLOGIES INC
Permit Number: P0121380
Facility ID: 1677050159
Effective Date: 9/14/2016

A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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



Final Permit-to-Install and Operate
FALLS FILTRATION TECHNOLOGIES INC
Permit Number: P0121380
Facility ID: 1677050159
Effective Date: 9/14/2016

B. Facility-Wide Terms and Conditions

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.
2. The Ohio EPA has determined that this facility may be subject to the requirements of a federal rule that Ohio EPA does not have the delegated authority to implement. Specifically:
 - a) On January 9, 2008, U.S. EPA promulgated the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR Part 63, Subpart HHHHHH. Spray applications using coatings containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd) and paint stripping operations using methylene chloride must be operated in compliance with this federal rule; and/or
 - b) On July 23, 2008, U.S.EPA promulgated the NESHAP for Nine Metal Fabrication and Finishing Source Categories at Area Sources, 40 CFR Part 63, Subpart XXXXXX. Metal fabrication of finishing metals containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd) must be operated in compliance with this federal rule.

Although Ohio EPA has determined that one or both of these federal rules (also known as a GACT) may apply, at this time Ohio EPA does not have the authority to enforce this standard. Instead, U.S. EPA has the authority to enforce this standard. Please be advised that all requirements associated with these rules are in effect and are enforceable by U.S. EPA. For more information on the area source rules, please refer to the following U.S. EPA website: <http://www.epa.gov/ttn/atw/area/arearules.html>.



Final Permit-to-Install and Operate
FALLS FILTRATION TECHNOLOGIES INC
Permit Number: P0121380
Facility ID: 1677050159
Effective Date: 9/14/2016

C. Emissions Unit Terms and Conditions

1. K002, Binks Paint Booth

Operations, Property and/or Equipment Description:

Spray paint booth

- 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. c)(2) and d)(5).
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	<p>Volatile organic compound (VOC) emissions shall not exceed 22.2 pounds per day from coatings, and 4.55 tons per year, including both coatings and cleanup materials.</p> <p>Particulate emissions (PE) shall not exceed 0.551 pound per hour and 2.4 tons per year from coatings.</p> <p>See c)(1) below.</p> <p>The requirements established pursuant to this rule also include the requirements of OAC rule 3745-21-09(U)(1), OAC rule 3745-17-11(B)(1) and OAC rule 3745-17-07(A)(1).</p>
b.	OAC rule 3745-21-09	For any source located in Ashtabula, Cuyahoga, Geauga, Lake, Lorain,

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		Medina, Portage, or Summit county subject to paragraph (U) of OAC rule 3745-21-09, the requirement to comply with paragraph (U) of OAC rule 3745-21-09 shall terminate at such time the source becomes subject to and complies with rule 3745-21-26 of the Administrative Code.
c.	OAC rule 3745-21-09(U)(2)(e)(ii)	See b)(2)a. below.
d.	OAC rule 3745-21-26	<p>Metal parts coating operations are exempt from paragraph (C) of OAC rule 3745-21-26 where the following occurs:</p> <p>The coating line never uses more than three gallons per day.</p> <p>The daily usage applicability level shall not apply to coatings employed by the coating line on parts or products which are not metal.</p> <p>See c)(3) and c)(4) below.</p> <p>The compliance date for the coating line is October 15, 2016.</p>
e.	OAC rule 3745-17-11(B)(1)	The requirements established pursuant to this rule are equivalent to the short term particulate emission limitation included in OAC rule 3745-31-05(A)(3).
f.	OAC rule 3745-17-07(A)(1)	See b)(2)b. below.
g.	OAC rule 3745-17-11(C)(3)	Paragraphs (C)(1) and (C)(2) of OAC rule 3745-17-11 do not apply since Permit to Install (PTI) 16-02480 identified particulate emission limitations and control measures based on best available technology.

(2) Additional Terms and Conditions

- a. The permittee shall not use more than 3 gallons of coating material per day for the coating of miscellaneous metal parts.
- b. Visible PE from any stack serving this emissions unit shall not exceed 20% opacity, as a six-minute average, except as specified by rule.

c) Operational Restrictions

- (1) The permittee shall operate the dry filtration system for control of particulate emissions whenever this emissions unit is in operation.
- (2) Prior to the use of any coating in this coating line, the permittee shall determine that the coating meets the toxic screening criteria described below.

Purpose: The purpose of this test is to evaluate coatings to determine if the chemical compounds in the coatings would be emitted at acceptable levels for this permit.

Data Needed: (1) MSDS sheet for each coating to be evaluated. (2) information on the maximum coating usage rate for the line as discussed in Step 1 below.

Step 1. Using the following factors, calculate the maximum coating usage rate in terms of gallons per hour:

- a. Assume the coating line operates at its maximum speed while still making usable product.
- b. Assume the coating line is operating at its largest coating laydown rate. This would typically be accomplished by assuming the coating line is painting the largest part available.

Step 2. Review the material safety data sheet (MSDS) for the coating. Note each chemical compound listed, its TLV and the percent by weight of the chemical compound in the coating.

Step 3. Determine if any of the chemical compounds listed in the MSDS are also listed in the following table. If any of the chemical compounds are listed in the table, then calculate the maximum annual emission of that compound by multiplying the maximum coating usage rate times the percent by weight of each chemical compound. Then multiply the result by 8760 hours per year. The result will be in pounds per year.

Check to see if the calculated emission rate is less than the allowable emission rate found in the below table. If all of the compounds emitted have a maximum annual emission of less than the allowed rate, then move on to step 4. If any of the compounds are emitted at a rate higher than the allowed emission rate, then contact your appropriate District or local air agency contact to determine if you can use the coating.

Chemical Compound	CAS	Molecular Weight (MW)	Allowed Emission Rate (lb(s)/year)
arsenic compounds, as As	7440-38-2	74.92	1.70
benzene	71-43-2	78.11	1100
benzidine	92-87-5	184.23	5.60
benzo(a)pyrene	50-32-8	252.30	6.90
beryllium and (Be compounds)	7440-41-7	9.01	0.350
cadmium	7440-43-9	112.4	5.20

chromium	7440-47-3	varies	0.690
hexachlorobenzine (HCB)	118-74-1	289.78	35.0
mercury (and Hg compounds)	7439-97-6	200.59	0.1
nickle (Ni subsulfide)	12035-72-2	240.19	17.0
polychlorinated dibenzo-p-dioxins	1746-01-6	varies	0.030
polychlorinated dibenzofurans	132-64-9	varies	0.030
polychlorinated biphenyls (PCBs, arcolors)	1336-36-3	varies	87.0
vinyl chloride	75-01-4	62.50	2000

Step 4. Find all of the chemical compounds in the coating that have a listed American Conference of Governmental Industrial Hygienists (ACGIH) Threshold Limit Value (TLV). For each chemical compound with a listed TLV (other than those in the above table), calculate the maximum short-term emission rate by multiplying the maximum coating usage rate times the percent by weight of each chemical compound. The results should be in terms of pounds of the chemical compound per hour.

Step 5. Determine if the compound will be emitted at or below the acceptable rate. This is done by searching the following table for chemical compound's TLV and then determining the maximum allowed emission rate listed in the below table. (Note. If the TLV is listed as ppm, then convert the TLV to $\mu\text{g}/\text{m}^3$ by using the following formal: $(\text{TLV in ppm}) \times (\text{MW}) \times (1000)/24.45 = \text{TLV in } \mu\text{g}/\text{m}^3$; where MW is the molecular weight of the compound.) This table lists the allowable emission rates for compounds with a TLV between the high range and low range. Compare the maximum calculated short-term emissions rate of each chemical compound to the allowed emission rate in the table. If the maximum emission rate is less than the allowed emission rate, then the chemical compound is emitted at an acceptable rate.

TLV Range ($\mu\text{g}/\text{m}^3$) (The TLV must be less than the high value listed and greater than or equal to the low value listed)		Allowed Emission Rate (lb(s)/hr)
15	1	0.000067
30	15	0.0010
60	30	0.0020
120	60	0.0040
240	120	0.0080
480	240	0.0160
960	480	0.0320
1,920	960	0.0640
3,840	1,920	0.128
7,680	3,840	0.256
15,360	7,680	0.512
30,720	15,360	1.02
61,440	30,720	2.05
122,880	61,440	4.10
245,760	122,880	8.19

491,520	245,760	16.4
983,040	491,520	32.8
1,966,080	983,040	65.5
3,932,160	1,966,080	131

Step 6. Check each chemical compound that has a listed TLV. If all compounds are emitted at a rate less than the allowed emission rate, then the coating passes the toxic screening test and can be used under this permit. If one or more of the chemical compounds are emitted at a rate greater than the allowed emission rate, then you should contact your appropriate District Office or local air agency contact to determine if you can use the coating.

- (3) One, or a combination, of the following application methods shall be used for coating application:
 - a. Electrostatic equipment.
 - b. High volume low pressure (HVLP) spray equipment.
 - c. Flow coating.
 - d. Roller coating.
 - e. Dip coating, including electrodeposition.
 - f. Airless spray.
 - g. Air-assisted airless spray.
 - h. Other coating application method capable of achieving a transfer efficiency equivalent or better than achieved by HVLP spraying.

- (4) Work practices shall be used to minimize VOC emissions from mixing operations, storage tanks and other containers, and handling operations for coatings, thinners, cleaning materials, and waste materials. Work practices shall include, but are not limited to, the following:
 - a. Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.
 - b. Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials.
 - c. Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.
 - d. Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one location to another in closed containers or pipes.

- e. Minimize VOC emissions from the cleaning of application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.
- d) **Monitoring and/or Recordkeeping Requirements**
- (1) The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
 - (2) The permittee shall collect and record the following information each day for this emissions unit:
 - a. The name and identification number of each coating employed.
 - b. The VOC content of each coating employed, in pounds per gallon, as applied.
 - c. The number of gallons of each coating employed.
 - d. The total number of gallons of all the coatings employed.
 - e. The total VOC emissions from all the coatings employed, in pounds [i.e., the sum of (b) times (c) for each coating employed].
 - (3) The permittee shall collect and record the following information for each month for this emissions unit:
 - a. The company identification of each cleanup material employed.
 - b. The number of gallons of each cleanup material employed.
 - c. The VOC content of each cleanup material employed, in pounds per gallon.
 - d. The total VOC emissions from all cleanup materials employed, in pounds [i.e., sum of (b) times (c) for each cleanup material employed].
 - e. The amount of cleanup material recovered, in pounds.
 - f. The total monthly VOC emissions from cleanup operations, in pounds [i.e., (d) - (e)].
 - (4) The permittee shall calculate and record the total annual VOC emissions from coatings and cleanup materials, [i.e., the sum of the daily VOC emission rates from the coating materials for the calendar year (2) above plus the sum of the monthly emissions from cleanup materials for the calendar year (3) above].
 - (5) The permittee shall collect and record the results of any toxic screening evaluations done per term c)(2) above.

e) Reporting Requirements

- (1) The permittee shall notify the Director (appropriate District Office or local air agency) in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage limit of 3 gallons per day. The notification shall include a copy of such record and shall be sent to the appropriate District Office or local air agency within 45 days after the exceedance occurs.
- (2) The owner or operator of a coating line that is subject to OAC rule 3745-21-26 with an initial startup date before the effective date of OAC rule 3745-21-26 shall notify the Ohio EPA district office or local air agency in writing that the coating line is subject to OAC rule 3745-21-26. The notification, which shall be submitted not later than sixty days after the effective date of OAC rule 3745-21-26 (i.e., December 14, 2015), shall provide the following information:
 - a. Name and address of the owner or operator.
 - b. Address (i.e., physical location) of the facility.
 - c. Equipment description and Ohio EPA application number (if assigned) of the subject coating line.
 - d. Identification of the VOC emission requirement, the means of compliance, and the compliance date for the subject coating line.
- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency 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.
- (4) 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 appropriate district office or local air agency.

f) Testing Requirements

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

3gallonsperdaytotalcoatingusage

ApplicableComplianceMethod:

Complianceshall bebasedupontherecordkeepingspecified ind)(2)d. above.
 - b. EmissionLimitation:

The VOC emissions shall not exceed 22.2 pounds perdayfromcoatings.



ApplicableComplianceMethod:

Complianceshall bebasedupontherecordkeepingspecified in d)(2)e. above.

c. EmissionLimitation:

The VOC emissions shall not exceed 4.55tons per year, including both coatings and cleanup materials.

ApplicableComplianceMethod:

Complianceshall be basedupontherecordkeeping specified in d)(4)above.

d. EmissionLimitation:

PE shall not exceed 0.551 poundperhour from coatings.

ApplicableComplianceMethod:

TodeterminetheworstcasePERate,thefollowing equation shallbeused:

$$E = \text{maximumcoatingsolidsusagerate, inpoundsperhour,} \times (1 - TE) \times (1 - CE)$$

whereE =PERate(lb/hr);

TE = fractionaltransferefficiency,whichistheratiooftheamountofcoatingsolidsdepositedo nthe coatedparttotheamountofcoatingsolidsused(0.55);and

CE =fractionalcontrolefficiencyofthecontrolequipment (0.99).

WhenrequestedbytheOhioEPA,thepermiteeshalldemonstratecompliancewiththea boveemissionslimitationpursuanttoOACrule3745-17-03(B)(10).

e. EmissionLimitation:

PE shall not exceed 2.4 tons per year from coatings.

ApplicableComplianceMethod:

Compliancewiththe hourlyemission limitation demonstratescompliancewiththe annual emission limitationbecausethe annual emission limitationisbasedonthe hourly emission limitationassumingthesourceoperated8760hoursperyear.

f. EmissionLimitation:

VisiblePEfromanystackserving thisemissionsunitshallnot exceed 20%opacity,asasix-minuteaverage,exceptasspecifiedbyrule.



Applicable Compliance Method:

When requested by the Ohio EPA, compliance with the above visible emission limitations shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in U.S. EPA Reference Method 9.

- (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 U.S. EPA Method 24 to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the U.S. EPA and shall use formulation data for that coating to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24.

U.S. EPA Method 24 or formulation data shall be used to determine the VOC contents of the clean up materials.

g) Miscellaneous Requirements

- (1) None.

2. R001, Adhesive Application

Operations, Property and/or Equipment Description:

Adhesive Application to paper elements

- 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)	The requirements of this rule also include the requirements of OAC rule 3745-21-07(G)(1). Formaldehyde emissions shall not exceed 0.44 pound per hour, 2.2 pounds per day, and 0.40 ton per year. Organic compound (OC) emissions shall not exceed 2.7 tons per year.
b.	OAC rule 3745-21-07(M)(4)	OC emissions shall not exceed 3.0 pounds per hour and 15 pounds per day. See b)(2)a. below.
c.	OAC rule 3745-21-28	OAC rule 3745-21-28 is not applicable because the total actual VOC emissions from all miscellaneous industrial adhesive and sealant application processes (including emissions from surface



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		preparation and cleanup activities) at the facility are less than 3.0 tons per twelve-month rolling period before the application of control systems and devices.

(2) Additional Terms and Conditions

a. For purposes of calculating organic material emissions from emissions unit R001, which is primarily a heat-cure oven, but includes a preceding associated adhesive coating operation, the permittee shall utilize a value of 0% as the maximum percentage of the organic material emissions emanating from the adhesive coating operation. The remaining 100% of the organic material emissions from emissions unit R001 are assumed to emanate from the heat-cure oven. This "split" of organic material emissions between the heat-cure oven and the preceding associated adhesive coating operation is based upon company assumptions.

c) Operational Restrictions

(1) The permittee shall only employ natural gas as fuel in this emissions unit.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information for each day for the coating operation associated with this emissions unit:

- a. the company identification of each coating, as applied;
- b. the number of gallons of each coating, as applied;
- c. the OC content of each coating, as applied, in pounds of OC per gallon of coating;
- d. the weight of filter paper heat-cured in the heat-cure oven, in pounds per day;
- e. the formaldehyde emissions (assuming a formaldehyde content of the filter paper of 1% by weight), in pounds per day (i.e., $e = 0.01 \times d$);
- f. the total OC emissions, in pounds per day;
- g. the hours of operation of this emissions unit;
- h. the average hourly total OC emission rate, in pounds per hour; and
- i. the average hourly formaldehyde emission rate, in pounds per hour.

(2) The permittee shall maintain the following monthly records:

- a. Total pounds or gallons of each adhesive, sealant, adhesive primer, sealant primer, cleanup solvent and surface preparation solvent used per calendar month.
 - b. VOC content (per cent by weight or pounds per gallon, whichever is consistent with the records kept in d)(2)a. above) of each adhesive, sealant, adhesive primer, sealant primer, cleanup solvent and surface preparation solvent used per calendar month.
 - c. The total monthly VOC emissions, before the application of capture systems and control devices, in pounds for all adhesives, sealant, adhesive primer, sealant primer, cleanup solvent and surface preparation solvent employed per calendar month.
 - d. The rolling twelve-month summation of VOC emissions, in tons, before the application of control systems and devices. The rolling twelve-month summation shall be calculated as the total VOC emissions for the current calendar month, plus the total VOC emissions from the previous eleven calendar months.
- (3) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
- e) Reporting Requirements
- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency 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.
 - (2) 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 appropriate district office or local air agency.
- f) Testing Requirements
- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitations:

Formaldehyde emissions shall not exceed 0.44 pound per hour, 2.2 pounds per day and 0.40 ton per year.

Applicable Compliance Method:

Compliance with the hourly and daily allowable formaldehyde emission limitations above shall be demonstrated in accordance with the record keeping requirements established in d)(1) above.



As long as compliance with the daily allowable emission limitation is maintained, compliance with the annual allowable emission limitation shall be ensured (the annual allowable emission limitation was determined by multiplying the daily allowable emission limitation by 365, and then dividing it by 2000 pounds per ton).

b. Emission Limitations:

OC emissions shall not exceed 3.0 pounds per hour, 15 pounds per day and 2.7 tons per year.

Applicable Compliance Method:

Compliance with the hourly and daily allowable OC emission limitations above shall be demonstrated in accordance with the record keeping requirements established in d)(1) above.

If required, compliance with the hourly allowable OC emission limitation above shall be demonstrated based on the results of emission testing conducted in accordance with Methods 1-4 and 18, 25 or 25A, as appropriate, of 40 CFR Part 60 Appendix A.

As long as compliance with the daily allowable emission limitation is maintained, compliance with the annual allowable emission limitation shall be ensured (the annual allowable emission limitation was determined by multiplying the daily allowable emission limitation by 365, and then dividing it by 2000 pounds per ton).

- (2) Formulation data or U.S. EPA Method 24 shall be used to determine the OC contents of the coatings, as applied.

g) Miscellaneous Requirements

- (1) None.