

Facility ID: 1431480257 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

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Facility ID: 1431480257 Emissions Unit ID: P001 Issuance type: Final State Permit To Operate

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**Part II - Special Terms and Conditions**

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.

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P001 - High Speed Dispersion Mixer 131	OAC rule 3745-31-05(A)(3) (PTI 14-05553)	Volatile organic compound (VOC) emissions from the mixer shall not exceed 147.3 pounds per day.  Particulate emissions (PE) from the mixer shall not exceed 18.4 pounds per day and 3.35 tons per year (TPY).  PE = PM10  See Section A.2.a.
	OAC rule 3745-31-05(C)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1), OAC rule 3745-17-07(B)(1), OAC rule 3745-17-08(B) and OAC rule 3745-31-05(C).  Volatile organic compound (VOC) emissions shall not exceed 39.9 TPY for emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027 combined, based upon a rolling, 12-month summation.
	OAC rule 3745-17-07(A)(1)	See Sections A.2.b and A.2.c.
	OAC rule 3745-17-07(B)(1)	See Section A.2.d.
	OAC rule 3745-17-08(B)	See Section A.2.e. The permittee shall minimize or eliminate visible

OAC rule 3745-17-11

particulate emissions by the use of a cover and dust collector.

The emission limitation specified by this rule is less stringent than the requirements of OAC rule 3745-31-05(A)(3).

**2. Additional Terms and Conditions**

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

The permittee shall not use, by weight of VOC, more than 39.9 tons per rolling, 12-month period based upon the monthly solvent input rate as depicted in the following equation, to emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027 combined.

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

The permittee has existing records to demonstrate compliance upon issuance of the permit. The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027 shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation. Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six- minute average, except as specified by rule.

Fugitive visible particulate emissions shall not exceed 20 percent opacity, as a three- minute average. The daily VOC and the daily and annual PE-PM10 emissions limitations outlined are based upon the emissions unit's Potential To Emit (PTE). Therefore, no records are required to demonstrate compliance with these limits.

**B. Operational Restrictions**

1. None

**C. Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information each month for emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027:
- The name and identification of each batch of paint produced.
  - The amount of each paint produced, in pounds.
  - The percent by weight of VOC of each paint mixed.
  - The total combined monthly amount of VOC used based upon the solvent input rate equation listed in term A.2.b, in tons per month.
  - The updated rolling, 12-month summation of VOC used based upon the solvent input rate equation listed in term A.2.b (the summation of the amount of the current month of VOC used and the previous eleven calendar months of total VOC used).
  - The total combined monthly VOC emissions, in tons per month.
  - The updated rolling, 12-month summation of VOC emissions (the summation of the current month's emission total and the previous eleven calendar months emission totals).
2. The permittee shall collect and record the following information each month for determining the particulate matter emissions:
- The name and identification of each batch of paint produced.
  - The total amount of solids used in the formulation of paints, in pounds.
  - The total monthly PM emissions, in tons per month.
3. The permittee shall collect and record the following information each month for emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027:
- The name and identification number of each batch of paint produced containing a HAP(s).
  - The number of pounds of each batch of paint produced.
  - The individual Hazardous Air Pollutant (HAP) content for each HAP per pound of paint produced in pounds of individual HAP per pound of paint.
  - The total combined HAP content of each paint in pounds of combined HAPs per pound of paint [sum all the individual HAP contents from (c)].
  - The total individual HAP emissions for each HAP from all paints employed in pounds or tons per month [for each individual HAP, the summation of (b) x 1.5 percent x (c)].
  - The total combined HAP emissions from all paints employed in pounds or tons per month [the summation of (b) x 1.5 percent x (d)].

g. The updated rolling, 12-month summation for individual HAP emissions for each HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

h. The updated rolling, 12-month summation for total combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.

**D. Reporting Requirements**

1. The permittee shall submit annual reports which specify the total organic compound emissions from emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027. These reports shall be submitted by January 30 of each year and cover the previous calendar year.
2. The permittee shall submit annual reports which specify the particulate matter emissions from this emissions units. These reports shall be submitted by January 30 of each year and cover the previous calendar year.
3. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the 12-month VOC emissions limitations listed in Section A.1 and the usage limitation in Section A.2.b. If no deviations occurred during the reporting period, the permittee shall state so in the report.
4. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month HAPs emissions limitations in Section A.2.c. If no deviations occurred during the reporting period, the permittee shall state so in the report.
5. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Terms and Conditions of this permit.

**E. Testing Requirements**

1. Compliance with the emission limitations in Sections A.1 and 2 of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:  
147.3 lbs/day of VOC

Applicable Compliance Method:

The daily VOC emission rate is based on the emission unit's potential to emit. The potential to emit was calculated by: (maximum production rate in pounds per hour) x (the percent by weight VOC) x (emission factor of 1.5%).

b. Emission Limitation:  
18.4 lbs/day of PE-PM10.

Applicable Compliance Method:

The daily PE-PM10 emission rate is based on the emissions unit's potential to emit. The potential to emit was calculated by: (maximum production rate in pounds per hour) x (the percent by weight PM) x (emission factor of 1.0%).

c. Emission Limitation:  
The amount of volatile organic compounds (VOC) used based upon the solvent input rate equation listed in term A.2.b shall not exceed 39.9 tons for emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027 combined, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the annual volatile organic compound used limitation based upon the solvent input rate equation listed in term A.2.b shall be based upon the record keeping requirements as specified in Section C.1.

d. Emission Limitation:  
Volatile organic compound (VOC) emissions shall not exceed 39.9 TPY for emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027 combined, based upon a rolling, 12-month summation

Applicable Compliance Method:

Compliance with the annual volatile organic compound emission limitations in term A.1 shall be based upon the record keeping requirements as specified in Section C.1.

e. Emission Limitation:  
3.35 TPY of PE-PM10.

Applicable Compliance Limitation:

Compliance with the annual particulate emission limitations in term A.1 shall be based upon the record keeping requirements as specified in Section C.2.

f. Emissions Limitations:  
9.9 TPY for any single HAP and 24.9 TPY for combined HAPs.

Applicable Compliance Method:

Compliance with the HAP emission limitations in term A.2.c will be determined by the record keeping requirements specified in Section C.3.

g. Emissions Limitations:  
Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule.

Fugitive visible particulate emissions shall not exceed twenty percent (20%) opacity, as a three-minute average.

Applicable Compliance Method  
 Compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

**F. Miscellaneous Requirements**

1. The following terms and conditions of this permit are federally enforceable: A, B, C, D, and E.

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**Facility ID: 1431480257 Emissions Unit ID: P002 Issuance type: Final State Permit To Operate**

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**Part II - Special Terms and Conditions**

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.

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P002 - High Speed Dispersion Mixer 104	OAC rule 3745-31-05(A)(3) (PTI 14-05553)	Volatile organic compound (VOC) emissions from the mixer shall not exceed 71.1 pounds per day.
		Particulate emissions (PE) from the mixer shall not exceed 8.8 pounds per day and 1.61 tons per year (TPY).
		PE = PM10
		See Section A.2.a
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1), OAC rule 3745-17-07(B)(1), OAC rule 3745-17-08(B) and OAC rule 3745-31-05(C)
	OAC rule 3745-31-05(C)	Volatile organic compound (VOC) emissions shall not exceed 39.9 TPY for emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027 combined, based upon a rolling, 12-month summation.
	OAC rule 3745-17-07(A)(1)	See Sections A.2.b and A.2.c.
	OAC rule 3745-17-07(B)(1)	See Section A.2.d.
	OAC rule 3745-17-08(B)	See Section A.2.e.
	OAC rule 3745-17-11	The permittee shall minimize or eliminate visible particulate emissions by the use of a cover and dust collector.
		The emission limitation specified by this rule is less stringent than the requirements of OAC rule 3745-31-05(A)(3).

**2. Additional Terms and Conditions**

- (a) Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emissions limitations and use of a cover and dust collector.  
 Paint production shall not result in an exceedance of the following emission limitations and /or control requirements:  
  
 The permittee shall not use, by weight of VOC, more than 39.9 tons per rolling, 12-month period based upon the monthly solvent input rate as depicted in the following equation to emissions units P001 -

P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027 combined.

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

The permittee has existing records to demonstrate compliance upon issuance of the permit. The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027 shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation. Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six- minute average, except as specified by rule. Fugitive visible particulate emissions shall not exceed 20 percent opacity, as a three- minute average. The daily VOC and the daily and annual PE-PM10 emissions limitations outlined are based upon the emissions unit's Potential To Emit (PTE). Therefore, no records are required to demonstrate compliance with these limits.

**B. Operational Restrictions**

1. None

**C. Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information each month for emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027:
  - a. The name and identification of each batch of paint produced.
  - b. The amount of each paint produced, in pounds.
  - c. The percent by weight of VOC of each paint mixed.
  - d. The total combined monthly amount of VOC used based upon the solvent input rate equation listed in term A.2.b, in tons per month.
  - e. The updated rolling, 12-month summation of VOC used based upon the solvent input rate equation listed in term A.2.b (the summation of the amount of the current month of VOC used and the previous eleven calendar months of total VOC used).
  - f. The total combined monthly VOC emissions, in tons per month.
  - g. The updated rolling, 12-month summation of VOC emissions (the summation of the current month's emission total and the previous eleven calendar months emission totals).
2. The permittee shall collect and record the following information each month for determining the particulate matter emissions:
  - a. The name and identification of each batch of paint produced.
  - b. The total amount of solids used in the formulation of paints, in pounds.
  - c. The total monthly PM emissions, in tons per month.
3. The permittee shall collect and record the following information each month for emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027:
  - a. The name and identification number of each batch of paint produced containing a HAP(s).
  - b. The number of pounds of each batch of paint produced.
  - c. The individual Hazardous Air Pollutant (HAP) content for each HAP per pound of paint produced in pounds of individual HAP per pound of paint.
  - d. The total combined HAP content of each paint in pounds of combined HAPs per pound of paint [sum all the individual HAP contents from (c)].
  - e. The total individual HAP emissions for each HAP from all paints employed in pounds or tons per month [for each individual HAP, the summation of (b) x 1.5 percent x (c)].
  - f. The total combined HAP emissions from all paints employed in pounds or tons per month [the summation of (b) x 1.5 percent x (d)].
  - g. The updated rolling, 12-month summation for individual HAP emissions for each HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
  - h. The updated rolling, 12-month summation for total combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.

**D. Reporting Requirements**

1. The permittee shall submit annual reports which specify the total organic compound emissions from emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027. These reports shall be submitted by January 30 of each year and cover the previous calendar year.

2. The permittee shall submit annual reports which specify the particulate matter emissions from this emissions units. These reports shall be submitted by January 30 of each year and cover the previous calendar year.
3. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the 12-month VOC emissions limitations listed in Section A.1 and the usage limitation in Section A.2.b. If no deviations occurred during the reporting period, the permittee shall state so in the report.
4. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month HAPs emissions limitations in Section A.2.c. If no deviations occurred during the reporting period, the permittee shall state so in the report.
5. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Terms and Conditions of this permit.

**E. Testing Requirements**

1. Compliance with the emission limitations in Sections A.1 and 2 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:  
71.1 lbs/day of VOC  
  
Applicable Compliance Method:  
The daily VOC emission rate is based on the emission unit's potential to emit. The potential to emit was calculated by: (maximum production rate in pounds per hour) x (the percent by weight VOC) x (emission factor of 1.5%).
  - b. Emission Limitation:  
8.8 lbs/day of PE-PM10.  
  
Applicable Compliance Method:  
The daily PE-PM10 emission rate is based on the emissions unit's potential to emit. The potential to emit was calculated by: (maximum production rate in pounds per hour) x (the percent by weight PM) x (emission factor of 1.0%).
  - c. Emission Limitation:  
The amount of volatile organic compounds (VOC) used based upon the solvent input rate equation listed in term A.2.b shall not exceed 39.9 tons for emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027 combined, based upon a rolling, 12-month summation.  
  
Applicable Compliance Method:  
Compliance with the annual volatile organic compound used limitation based upon the solvent input rate equation listed in term A.2.b shall be based upon the record keeping requirements as specified in Section C.1.
  - d. Emission Limitation:  
Volatile organic compound (VOC) emissions shall not exceed 39.9 TPY for emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027 combined, based upon a rolling, 12-month summation  
  
Applicable Compliance Method:  
Compliance with the annual volatile organic compound emission limitations in term A.1 shall be based upon the record keeping requirements as specified in Section C.1.
  - e. Emission Limitation:  
1.61 TPY of PE-PM10.  
  
Applicable Compliance Limitation:  
Compliance with the annual particulate emission limitations in term A.1 shall be based upon the record keeping requirements as specified in Section C.2.
  - f. Emissions Limitations:  
9.9 TPY for any single HAP and 24.9 TPY for combined HAPs.  
  
Applicable Compliance Method:  
Compliance with the HAP emission limitations in term A.2.c will be determined by the record keeping requirements specified in Section C.3.
  - g. Emissions Limitations:  
Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule.  
  
Fugitive visible particulate emissions shall not exceed twenty percent (20%) opacity, as a three-minute average.  
  
Applicable Compliance Method  
Compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

**F. Miscellaneous Requirements**

1. The following terms and conditions of this permit are federally enforceable: A, B, C, D, and E.

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Facility ID: 1431480257 Emissions Unit ID: P003 Issuance type: Final State Permit To Operate

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**Part II - Special Terms and Conditions**

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.

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P003 - High Speed Dispersion Mixer 105	OAC rule 3745-31-05(A)(3) (PTI 14-05553)	<p>Volatile organic compound (VOC) emissions from the mixer shall not exceed 71.1 pounds per day.</p> <p>Particulate emissions (PE) from the mixer shall not exceed 8.8 pounds per day and 1.61 tons per year (TPY).</p> <p>PE = PM10</p> <p>See Section A.2.a.</p>
	OAC rule 3745-31-05(C)	<p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1), OAC rule 3745-17-07(B)(1), OAC rule 3745-17-08(B) and OAC rule 3745-31-05(C).</p> <p>Volatile organic compound (VOC) emissions shall not exceed 39.9 TPY for emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027 combined, based upon a rolling, 12-month summation.</p>
	OAC rule 3745-17-07(A)(1)	See Sections A.2.b and A.2.c.
	OAC rule 3745-17-07(B)(1)	See Section A.2.d.
	OAC rule 3745-17-08(B)	See Section A.2.e.
OAC rule 3745-17-11	<p>The permittee shall minimize or eliminate visible particulate emissions by the use of a cover and dust collector.</p> <p>The emission limitation specified by this rule is less stringent than the requirements of OAC rule 3745-31-05(A)(3)</p>	

**2. Additional Terms and Conditions**

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

Paint production shall not result in an exceedance of the following limitations and /or control requirements:

The permittee shall not use, by weight of VOC, more than 39.9 tons per rolling, 12-month period based upon the monthly solvent input rate as depicted in the following equation to emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027 combined.

$$\text{Monthly solvent input rate} = (A \times B \times C) / 2000$$

where A = the number of pounds of each paint mixed per month, B = the percent by weight of solvent of each paint mixed, and C = 0.015 (emission factor for amount of VOC emitted in lbs of VOC per lbs of solvent in the paint).

The permittee has existing records to demonstrate compliance upon issuance of the permit. The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027 shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation. Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six- minute average, except as specified by rule. Fugitive visible particulate emissions shall not exceed 20 percent opacity, as a three- minute average. The daily VOC and the daily and annual PE-PM10 emissions limitations outlined are based upon the emissions unit's Potential To Emit (PTE). Therefore, no records are required to demonstrate compliance with these limits.

**B. Operational Restrictions**

1. None

**C. Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information each month for emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027:
  - a. The name and identification of each batch of paint produced.
  - b. The amount of each paint produced, in pounds.
  - c. The percent by weight of VOC of each paint mixed.
  - d. The total combined monthly amount of VOC used based upon the solvent input rate equation listed in term A.2.b, in tons per month.
  - e. The updated rolling, 12-month summation of VOC used based upon the solvent input rate equation listed in term A.2.b (the summation of the amount of the current month of VOC used and the previous eleven calendar months of total VOC used).
  - f. The total combined monthly VOC emissions, in tons per month.
  - g. The updated rolling, 12-month summation of VOC emissions (the summation of the current month's emission total and the previous eleven calendar months emission totals).
2. The permittee shall collect and record the following information each month for determining the particulate matter emissions:
  - a. The name and identification of each batch of paint produced.
  - b. The total amount of solids used in the formulation of paints, in pounds.
  - c. The total monthly PM emissions, in tons per month.
3. The permittee shall collect and record the following information each month for emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027:
  - a. The name and identification number of each batch of paint produced containing a HAP(s).
  - b. The number of pounds of each batch of paint produced.
  - c. The individual Hazardous Air Pollutant (HAP) content for each HAP per pound of paint produced in pounds of individual HAP per pound of paint.
  - d. The total combined HAP content of each paint in pounds of combined HAPs per pound of paint [sum all the individual HAP contents from (c)].
  - e. The total individual HAP emissions for each HAP from all paints employed in pounds or tons per month [for each individual HAP, the summation of (b) x 1.5 percent x (c)].
  - f. The total combined HAP emissions from all paints employed in pounds or tons per month [the summation of (b) x 1.5 percent x (d)].
  - g. The updated rolling, 12-month summation for individual HAP emissions for each HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
  - h. The updated rolling, 12-month summation for total combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.

**D. Reporting Requirements**

1. The permittee shall submit annual reports which specify the total organic compound emissions from emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027. These reports shall be submitted by January 30 of each year and cover the previous calendar year.
2. The permittee shall submit annual reports which specify the particulate matter emissions from this emissions units. These reports shall be submitted by January 30 of each year and cover the previous calendar year.
3. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the 12-month VOC emissions limitations listed in Section A.1 and the usage limitation in Section A.2.b. If no deviations occurred during the reporting period, the permittee shall state so in the report.
4. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month HAPs emissions limitations in Section A.2.c. If no deviations occurred during the reporting period, the permittee shall state so in the report.
5. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Terms and Conditions of this permit.

**E. Testing Requirements**

1. Compliance with the emission limitations in Sections A.1 and 2 of these terms and conditions shall be determined

in accordance with the following methods:

a. Emission Limitation:  
71.1 lbs/day of VOC

Applicable Compliance Method:

The daily VOC emission rate is based on the emission unit's potential to emit. The potential to emit was calculated by: (maximum production rate in pounds per hour) x (the percent by weight VOC) x (emission factor of 1.5%).

b. Emission Limitation:  
8.8 lbs/day of PE-PM10.

Applicable Compliance Method:

The daily PE-PM10 emission rate is based on the emissions unit's potential to emit. The potential to emit was calculated by: (maximum production rate in pounds per hour) x (the percent by weight PM) x (emission factor of 1.0%).

c. Emission Limitation:

The amount of volatile organic compounds (VOC) used based upon the solvent input rate equation listed in term A.2.b shall not exceed 39.9 TPY for emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027 combined, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the annual volatile organic compounds emission limitation based upon the solvent input rate equation listed in term A.2.b shall be based upon the record keeping requirements as specified in Section C.1.

d. Emission Limitation:

Volatile organic compound (VOC) emissions shall not exceed 39.9 TPY for emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027 combined, based upon a rolling, 12-month summation

Applicable Compliance Method:

Compliance with the annual volatile organic compound emission limitations in term A.1 shall be based upon the record keeping requirements as specified in Section C.1.

e. Emission Limitation:

1.61 TPY of PE-PM10.

Applicable Compliance Limitation:

Compliance with the annual particulate emission limitations in term A.1 shall be based upon the record keeping requirements as specified in Section C.2.

f. Emissions Limitations:

9.9 TPY for any single HAP and 24.9 TPY for combined HAPs.

Applicable Compliance Method:

Compliance with the HAP emission limitations in term A.2.c will be determined by the record keeping requirements specified in Section C.3.

g. Emissions Limitations:

Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule.

Fugitive visible particulate emissions shall not exceed twenty percent (20%) opacity, as a three-minute average.

Applicable Compliance Method

Compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

**F. Miscellaneous Requirements**

1. The following terms and conditions of this permit are federally enforceable: A, B, C, D, and E.

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

**Facility ID: 1431480257 Emissions Unit ID: P004 Issuance type: Final State Permit To Operate**

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**Part II - Special Terms and Conditions**

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.

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P004 - High Speed Dispersion Mixer 127	OAC rule 3745-31-05(A)(3) (PTI 14-05553)	<p>Volatile organic compound (VOC) emissions from the mixer shall not exceed 147.5 pounds per day.</p> <p>Particulate emissions (PE) from the mixer shall not exceed 18.5 pounds per day and 3.37 tons per year (TPY).</p> <p>PE = PM10</p> <p>See Section A.2.a.</p>
	OAC rule 3745-31-05(C)	<p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1), OAC rule 3745-17-07(B)(1), OAC rule 3745-17-08(B) and OAC rule 3745-31-05(C).</p> <p>Volatile organic compound (VOC) emissions shall not exceed 39.9 TPY for emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027 combined, based upon a rolling, 12-month summation.</p>
	OAC rule 3745-17-07(A)(1) OAC rule 3745-17-07(B)(1) OAC rule 3745-17-08(B)	<p>See Sections A.2.b and A.2.c.</p> <p>See Section A.2.d.</p> <p>See Section A.2.e.</p> <p>The permittee shall minimize or eliminate visible particulate emissions by the use of a cover and dust collector.</p>
	OAC rule 3745-17-11	<p>The emission limitation specified by this rule is less stringent than the requirements of OAC rule 3745-31-05(A)(3).</p>

**2. Additional Terms and Conditions**

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

Paint production shall not result in an exceedance of the following limitations and /or control requirements:

The permittee shall not use, by weight of VOC, more than 39.9 tons per rolling, 12-month period based upon the monthly solvent input rate as depicted in the following equation, to emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027 combined.

Monthly solvent input rate = (A x B x C)/2000 where A = the number of pounds of each paint mixed per month, B = the percent by weight of solvent of each paint mixed, and C = 0.015 (emission factor for amount of VOC emitted in lbs of VOC per lbs of solvent in the paint).

The permittee has existing records to demonstrate compliance upon issuance of the permit. The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027 shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation. Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six- minute average, except as specified by rule. Fugitive visible particulate emissions shall not exceed 20 percent opacity, as a three- minute average. The daily VOC and the daily and annual PE-PM10 emissions limitations outlined are based upon the emissions unit's Potential To Emit (PTE). Therefore, no records are required to demonstrate compliance with these limits.

**B. Operational Restrictions**

1. None

**C. Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information each month for emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027:
  - a. The name and identification of each batch of paint produced.
  - b. The amount of each paint produced, in pounds.
  - c. The percent by weight of VOC of each paint mixed.
  - d. The total combined monthly amount of VOC used based upon the solvent input rate equation listed in term A.2.b, in tons per month.

- e. The updated rolling, 12-month summation of VOC used based upon the solvent input rate equation listed in term A.2.b (the summation of the amount of the current month of VOC used and the previous eleven calendar months of total VOC used).
  - f. The total combined monthly VOC emissions, in tons per month.
  - g. The updated rolling, 12-month summation of VOC emissions (the summation of the current month's emission total and the previous eleven calendar months emission totals).
2. The permittee shall collect and record the following information each month for determining the particulate matter emissions:
- a. The name and identification of each batch of paint produced.
  - b. The total amount of solids used in the formulation of paints, in pounds.
  - c. The total monthly PM emissions, in tons per month.
3. The permittee shall collect and record the following information each month for emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027:
- a. The name and identification number of each batch of paint produced containing a HAP(s).
  - b. The number of pounds of each batch of paint produced.
  - c. The individual Hazardous Air Pollutant (HAP) content for each HAP per pound of paint produced in pounds of individual HAP per pound of paint.
  - d. The total combined HAP content of each paint in pounds of combined HAPs per pound of paint [sum all the individual HAP contents from (c)].
  - e. The total individual HAP emissions for each HAP from all paints employed in pounds or tons per month [for each individual HAP, the summation of (b) x 1.5 percent x (c)].
  - f. The total combined HAP emissions from all paints employed in pounds or tons per month [the summation of (b) x 1.5 percent x (d)].
  - g. The updated rolling, 12-month summation for individual HAP emissions for each HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
  - h. The updated rolling, 12-month summation for total combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.

**D. Reporting Requirements**

1. The permittee shall submit annual reports which specify the total organic compound emissions from emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027. These reports shall be submitted by January 30 of each year and cover the previous calendar year.
2. The permittee shall submit annual reports which specify the particulate matter emissions from this emissions units. These reports shall be submitted by January 30 of each year and cover the previous calendar year.
3. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the 12-month VOC emissions limitations listed in Section A.1 and the usage limitation in Section A.2.b. If no deviations occurred during the reporting period, the permittee shall state so in the report.
4. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month HAPs emissions limitations in Section A.2.c. If no deviations occurred during the reporting period, the permittee shall state so in the report.
5. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Terms and Conditions of this permit.

**E. Testing Requirements**

1. Compliance with the emission limitations in Sections A.1 and 2 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:  
147.5 lbs/day of VOC
  - Applicable Compliance Method:  
The daily VOC emission rate is based on the emission unit's potential to emit. The potential to emit was calculated by: (maximum production rate in pounds per hour) x (the percent by weight VOC) x (emission factor of 1.5%).
  - b. Emission Limitation:  
18.5 lbs/day of PE-PM10.
  - Applicable Compliance Method:  
The daily PE-PM10 emission rate is based on the emissions unit's potential to emit. The potential to emit was calculated by: (maximum production rate in pounds per hour) x (the percent by weight PM) x (emission factor of

1.0%).

c. Emission Limitation:

The total amount of volatile organic compounds (VOC) used based upon the solvent input rate equation listed in term A.2.b shall not exceed 39.9 tons for emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027 combined, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the annual volatile organic compound used limitation based upon the solvent input rate equation listed in term A.2.b shall be based upon the record keeping requirements as specified in Section C.1.

d. Emission Limitation:

Volatile organic compound (VOC) emissions shall not exceed 39.9 TPY for emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027 combined, based upon a rolling, 12-month summation

Applicable Compliance Method:

Compliance with the annual volatile organic compound emission limitations in term A.1 shall be based upon the record keeping requirements as specified in Section C.1.

e. Emission Limitation:

3.37 TPY of PE-PM10.

Applicable Compliance Limitation:

Compliance with the annual particulate emission limitations in term A.1 shall be based upon the record keeping requirements as specified in Section C.2.

f. Emissions Limitations:

9.9 TPY for any single HAP and 24.9 TPY for combined HAPs.

Applicable Compliance Method:

Compliance with the HAP emission limitations in term A.2.c will be determined by the record keeping requirements specified in Section C.3.

g. Emissions Limitations:

Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule.

Fugitive visible particulate emissions shall not exceed twenty percent (20%) opacity, as a three-minute average.

Applicable Compliance Method

Compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

F. **Miscellaneous Requirements**

1. The following terms and conditions of this permit are federally enforceable: A, B, C, D, and E.

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

**Facility ID: 1431480257 Emissions Unit ID: P005 Issuance type: Final State Permit To Operate**

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**Part II - Special Terms and Conditions**

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.

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P005 - High Speed Dispersion Mixer 108	OAC rule 3745-31-05(A)(3) (PTI 14-05553)	Volatile organic compound (VOC) emissions from the mixer shall not exceed 146.7 pounds per day.  Particulate emissions (PE) from the mixer shall not exceed 18.4 pounds per day and 3.35 tons per year (TPY).

PE = PM10

See Section A.2.a.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1), OAC rule 3745-17-07(B)(1), OAC rule 3745-17-08(B) and OAC rule 3745-31-05(C).

OAC rule 3745-31-05(C)

Volatile organic compound (VOC) emissions shall not exceed 39.9 TPY for emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027 combined, based upon a rolling, 12-month summation.

See Sections A.2.b and A.2.c.

OAC rule 3745-17-07(A)(1)

See Section A.2.d.

OAC rule 3745-17-07(B)(1)

See Section A.2.e.

OAC rule 3745-17-08(B)

The permittee shall minimize or eliminate visible particulate emissions by the use of a cover and dust collector.

OAC rule 3745-17-11

The emission limitation specified by this rule is less stringent than the requirements of OAC rule 3745-31-05(A)(3).

**2. Additional Terms and Conditions**

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

Paint production shall not result in an exceedance of the following limitations and /or control requirements:

The permittee shall not use, by weight of VOC, more than 39.9 tons per rolling, 12-month period based upon the monthly solvent input rate as depicted in the following equation, to emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027 combined.

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

The permittee has existing records to demonstrate compliance upon issuance of the permit. The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027 shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation. Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six- minute average, except as specified by rule. Fugitive visible particulate emissions shall not exceed 20 percent opacity, as a three- minute average. The daily VOC and the daily and annual PE-PM10 emissions limitations outlined are based upon the emissions unit's Potential To Emit (PTE). Therefore, no records are required to demonstrate compliance with these limits.

**B. Operational Restrictions**

- 1. None

**C. Monitoring and/or Record Keeping Requirements**

- 1. The permittee shall collect and record the following information each month for emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027:
  - a. The name and identification of each batch of paint produced.
  - b. The amount of each paint produced, in pounds.
  - c. The percent by weight of VOC of each paint mixed.
  - d. The total combined monthly amount of VOC used based upon the solvent input rate equation listed in term A.2.b, in tons per month.
  - e. The updated rolling, 12-month summation of VOC used based upon the solvent input rate equation listed in term A.2.b (the summation of the amount of current month of VOC used and the previous eleven calendar months of total VOC used).
  - f. The total combined monthly VOC emissions, in tons per month.
  - g. The updated rolling, 12-month summation of VOC emissions (the summation of the current month's emission total and the previous eleven calendar months emission totals).
- 2. The permittee shall collect and record the following information each month for determining the particulate matter emissions:
  - a. The name and identification of each batch of paint produced.
  - b. The total amount of solids used in the formulation of paints, in pounds.

- c. The total monthly PM emissions, in tons per month.
3. The permittee shall collect and record the following information each month for emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027:
- The name and identification number of each batch of paint produced containing a HAP(s).
  - The number of pounds of each batch of paint produced.
  - The individual Hazardous Air Pollutant (HAP) content for each HAP per pound of paint produced in pounds of individual HAP per pound of paint.
  - The total combined HAP content of each paint in pounds of combined HAPs per pound of paint [sum all the individual HAP contents from (c)].
  - The total individual HAP emissions for each HAP from all paints employed in pounds or tons per month [for each individual HAP, the summation of (b) x 1.5 percent x (c)].
  - The total combined HAP emissions from all paints employed in pounds or tons per month [the summation of (b) x 1.5 percent x (d)].
  - The updated rolling, 12-month summation for individual HAP emissions for each HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
  - The updated rolling, 12-month summation for total combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.

**D. Reporting Requirements**

- The permittee shall submit annual reports which specify the total organic compound emissions from emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027. These reports shall be submitted by January 30 of each year and cover the previous calendar year.
- The permittee shall submit annual reports which specify the particulate matter emissions from this emissions units. These reports shall be submitted by January 30 of each year and cover the previous calendar year.
- The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the 12-month VOC emissions limitations listed in Section A.1 and the usage limitation in Section A.2.b. If no deviations occurred during the reporting period, the permittee shall state so in the report.
- The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month HAPs emissions limitations in Section A.2.c. If no deviations occurred during the reporting period, the permittee shall state so in the report.
- The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Terms and Conditions of this permit.

**E. Testing Requirements**

- Compliance with the emission limitations in Sections A.1 and 2 of these terms and conditions shall be determined in accordance with the following methods:
  - Emission Limitation:**  
146.7 lbs/day of VOC
  - Applicable Compliance Method:**  
The daily VOC emission rate is based on the emission unit's potential to emit. The potential to emit was calculated by: (maximum production rate in pounds per hour) x (the percent by weight VOC) x (emission factor of 1.5%).
  - Emission Limitation:**  
18.4 lbs/day of PE-PM10.
  - Applicable Compliance Method:**  
The daily PE-PM10 emission rate is based on the emissions unit's potential to emit. The potential to emit was calculated by: (maximum production rate in pounds per hour) x (the percent by weight PM) x (emission factor of 1.0%).
  - Emission Limitation:**  
The amount of Volatile organic compounds (VOC) used based upon the solvent input rate equation listed in term A.2.b shall not exceed 39.9 tons for emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027 combined, based upon a rolling, 12-month summation.
  - Applicable Compliance Method:**  
Compliance with the annual volatile organic compound used limitation based upon the solvent input rate equation listed in term A.2.b shall be based upon the record keeping requirements as specified in Section C.1.
  - Emission Limitation:**  
Volatile organic compound (VOC) emissions shall not exceed 39.9 TPY for emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027 combined, based upon a rolling, 12-month summation
  - Applicable Compliance Method:**

Compliance with the annual volatile organic compound emission limitations in term A.1 shall be based upon the record keeping requirements as specified in Section C.1.

e. Emission Limitation:  
3.35 TPY of PE-PM10.

Applicable Compliance Limitation:  
Compliance with the annual particulate emission limitations in term A.1 shall be based upon the record keeping requirements as specified in Section C.2.

f. Emissions Limitations:  
9.9 TPY for any single HAP and 24.9 TPY for combined HAPs.

Applicable Compliance Method:  
Compliance with the HAP emission limitations in term A.2.c will be determined by the record keeping requirements specified in Section C.3.

g. Emissions Limitations:  
Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule.

Fugitive visible particulate emissions shall not exceed twenty percent (20%) opacity, as a three-minute average.

Applicable Compliance Method  
Compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

**F. Miscellaneous Requirements**

1. The following terms and conditions of this permit are federally enforceable: A, B, C, D, and E.

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

**Facility ID: 1431480257 Emissions Unit ID: P007 Issuance type: Final State Permit To Operate**

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**Part II - Special Terms and Conditions**

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.

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P007 - High Speed Dispersion Mixer 102	OAC rule 3745-31-05(A)(3) (PTI 14-05553)	Volatile organic compound (VOC) emissions from the mixer shall not exceed 133.4 pounds per day.  Particulate emissions (PE) from the mixer shall not exceed 16.6 pounds per day and 3.03 tons per year (TPY).  PE = PM10  See Section A.2.a.  The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1), OAC rule 3745-17-07(B)(1), OAC rule 3745-17-08(B) and OAC rule 3745-31-05(C).
	OAC rule 3745-31-05(C)	Volatile organic compound (VOC) emissions shall not exceed 39.9 TPY for emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027 combined, based upon a rolling, 12-month summation.

OAC rule 3745-17-07(A)(1)	See Sections A.2.b and A.2.c.
OAC rule 3745-17-07(B)(1)	See Section A.2.d.
OAC rule 3745-17-08(B)	See Section A.2.e.
	The permittee shall minimize or eliminate visible particulate emissions by the use of a cover and dust collector.
OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the requirements of OAC rule 3745-31-05(A)(3).

**2. Additional Terms and Conditions**

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

The permittee shall not use, by weight of VOC, more than 39.9 tons per rolling, 12-month period based upon the monthly solvent input rate as depicted in the following equation, to emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027 combined.

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

The permittee has existing records to demonstrate compliance upon issuance of the permit. The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027 shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation. Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six- minute average, except as specified by rule. Fugitive visible particulate emissions shall not exceed 20 percent opacity, as a three- minute average. The daily VOC and the daily and annual PE-PM10 emissions limitations outlined are based upon the emissions unit's Potential To Emit (PTE). Therefore, no records are required to demonstrate compliance with these limits.

**B. Operational Restrictions**

1. None

**C. Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information each month for emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027:
- The name and identification of each batch of paint produced.
  - The amount of each paint produced, in pounds.
  - The percent by weight of VOC of each paint mixed.
  - The total combined monthly amount of VOC used based upon the solvent input rate equation listed in term A.2.b, in tons per month.
  - The updated rolling, 12-month summation of VOC used based upon the solvent input rate equation listed in term A.2.b (the summation of the amount of the current month of VOC used and the previous eleven calendar months of total VOC used).
  - The total combined monthly VOC emissions, in tons per month.
  - The updated rolling, 12-month summation of VOC emissions (the summation of the current month's emission total and the previous eleven calendar months emission totals).
2. The permittee shall collect and record the following information each month for determining the particulate matter emissions:
- The name and identification of each batch of paint produced.
  - The total amount of solids used in the formulation of paints, in pounds.
  - The total monthly PM emissions, in tons per month.
3. The permittee shall collect and record the following information each month for emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027:
- The name and identification number of each batch of paint produced containing a HAP(s).
  - The number of pounds of each batch of paint produced.
  - The individual Hazardous Air Pollutant (HAP) content for each HAP per pound of paint produced in pounds of individual HAP per pound of paint.
  - The total combined HAP content of each paint in pounds of combined HAPs per pound of paint [sum all the individual HAP contents from (c)].

e. The total individual HAP emissions for each HAP from all paints employed in pounds or tons per month [for each individual HAP, the summation of (b) x 1.5 percent x (c)].

f. The total combined HAP emissions from all paints employed in pounds or tons per month [the summation of (b) x 1.5 percent x (d)].

g. The updated rolling, 12-month summation for individual HAP emissions for each HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

h. The updated rolling, 12-month summation for total combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.

**D. Reporting Requirements**

1. The permittee shall submit annual reports which specify the total organic compound emissions from emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027. These reports shall be submitted by January 30 of each year and cover the previous calendar year.
2. The permittee shall submit annual reports which specify the particulate matter emissions from this emissions units. These reports shall be submitted by January 30 of each year and cover the previous calendar year.
3. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the 12-month VOC emissions limitations listed in Section A.1 and the usage limitation in Section A.2.b. If no deviations occurred during the reporting period, the permittee shall state so in the report.
4. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month HAPs emissions limitations in Section A.2.c. If no deviations occurred during the reporting period, the permittee shall state so in the report.
5. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Terms and Conditions of this permit.

**E. Testing Requirements**

1. Compliance with the emission limitations in Sections A.1 and 2 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:  
133.4 lbs/day of VOC  
  
Applicable Compliance Method:  
The daily VOC emission rate is based on the emission unit's potential to emit. The potential to emit was calculated by: (maximum production rate in pounds per hour) x (the percent by weight VOC) x (emission factor of 1.5%).
  - b. Emission Limitation:  
16.6 lbs/day of PE-PM10.  
  
Applicable Compliance Method:  
The daily PE-PM10 emission rate is based on the emissions unit's potential to emit. The potential to emit was calculated by: (maximum production rate in pounds per hour) x (the percent by weight PM) x (emission factor of 1.0%).
  - c. Emission Limitation:  
The amount of volatile organic compounds (VOC) used based upon the solvent input rate equation listed in term A.2.b shall not exceed 39.9 tons for emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027 combined, based upon a rolling, 12-month summation.  
  
Applicable Compliance Method:  
Compliance with the annual volatile organic compound used limitation based upon the solvent input rate equation listed in term A.2.b shall be based upon the record keeping requirements as specified in Section C.1.
  - d. Emission Limitation:  
Volatile organic compound (VOC) emissions shall not exceed 39.9 TPY for emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027 combined, based upon a rolling, 12-month summation  
  
Applicable Compliance Method:  
Compliance with the annual volatile organic compound emission limitations in term A.1 shall be based upon the record keeping requirements as specified in Section C.1.
  - e. Emission Limitation:  
3.03 TPY of PE-PM10.  
  
Applicable Compliance Limitation:  
Compliance with the annual particulate emission limitations in term A.1 shall be based upon the record keeping requirements as specified in Section C.2.
  - f. Emissions Limitations:  
9.9 TPY for any single HAP and 24.9 TPY for combined HAPs.  
  
Applicable Compliance Method:  
Compliance with the HAP emission limitations in term A.2.c will be determined by the record keeping requirements specified in Section C.3.

g. Emissions Limitations:

Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule.

Fugitive visible particulate emissions shall not exceed twenty percent (20%) opacity, as a three-minute average.

Applicable Compliance Method

Compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

F. **Miscellaneous Requirements**

1. The following terms and conditions of this permit are federally enforceable: A, B, C, D, and E.

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

Facility ID: 1431480257 Emissions Unit ID: P011 Issuance type: Final State Permit To Operate

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**Part II - Special Terms and Conditions**

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.

A. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P011 - High Speed Dispersion Mixer 107	OAC rule 3745-31-05(A)(3) (PTI 14-05553)	Volatile organic compound (VOC) emissions from the mixer shall not exceed 106.8 pounds per day  Particulate emissions (PE) from the mixer shall not exceed 13.3 pounds per day and 2.42 tons per year (TPY)  PE = PM10  See Section A.2.a  The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1), OAC rule 3745-17-07(B)(1), OAC rule 3745-17-08(B) and OAC rule 3745-31-05(C)
	OAC rule 3745-31-05(C)	Volatile organic compound (VOC) emissions shall not exceed 39.9 TPY for emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027 combined, based upon a rolling, 12-month summation.  See Sections A.2.b and A.2.c.
	OAC rule 3745-17-07(A)(1)	See Section A.2.d.
	OAC rule 3745-17-07(B)(1)	See Section A.2.e.
	OAC rule 3745-17-08(B)	The permittee shall minimize or eliminate visible particulate emissions by the use of a cover and dust collector.
OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the requirements of OAC rule 3745-31-05(A)(3).	

2. **Additional Terms and Conditions**

- (a) Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emissions

limitations and use of a cover and dust collector.

Paint production shall not result in an exceedance of the following limitations and /or control requirements:

The permittee shall not use, by weight of VOC, more than 39.9 tons per rolling, 12-month period based upon the monthly solvent input rate as depicted in the following equation, to emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027 combined.

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

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

The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027 shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs.

Compliance with the above limitations shall be based on a rolling, 12-month summation.

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

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

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

**B. Operational Restrictions**

1. None

**C. Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information each month for emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027:
  - a. The name and identification of each batch of paint produced.
  - b. The amount of each paint produced, in pounds.
  - c. The percent by weight of VOC of each paint mixed.
  - d. The total combined monthly amount of VOC used based upon the solvent input rate equation listed in term A.2.b, in tons per month.
  - e. The updated rolling, 12-month summation of VOC used based upon the solvent input rate equation listed in term A.2.b (the summation of the amount of the current month VOC used and the previous eleven calendar months of total VOC used).
  - f. The total combined monthly VOC emissions, in tons per month.
  - g. The updated rolling, 12-month summation of VOC emissions (the summation of the current month's emission total and the previous eleven calendar months emission totals).
2. The permittee shall collect and record the following information each month for determining the particulate matter emissions:
  - a. The name and identification of each batch of paint produced.
  - b. The total amount of solids used in the formulation of paints, in pounds.
  - c. The total monthly PM emissions, in tons per month.
3. The permittee shall collect and record the following information each month for emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027:
  - a. The name and identification number of each batch of paint produced containing a HAP(s).
  - b. The number of pounds of each batch of paint produced.
  - c. The individual Hazardous Air Pollutant (HAP) content for each HAP per pound of paint produced in pounds of individual HAP per pound of paint.
  - d. The total combined HAP content of each paint in pounds of combined HAPs per pound of paint [sum all the individual HAP contents from (c)].
  - e. The total individual HAP emissions for each HAP from all paints employed in pounds or tons per month [for each individual HAP, the summation of (b) x 1.5 percent x (c)].
  - f. The total combined HAP emissions from all paints employed in pounds or tons per month [the summation of (b) x 1.5 percent x (d)].
  - g. The updated rolling, 12-month summation for individual HAP emissions for each HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
  - h. The updated rolling, 12-month summation for total combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a

line-by-line basis.

**D. Reporting Requirements**

1. The permittee shall submit annual reports which specify the total organic compound emissions from emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027. These reports shall be submitted by January 30 of each year and cover the previous calendar year.
2. The permittee shall submit annual reports which specify the particulate matter emissions from this emissions units. These reports shall be submitted by January 30 of each year and cover the previous calendar year.
3. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the 12-month VOC emissions limitations listed in Section A.1 and the usage limitation in Section A.2.b. If no deviations occurred during the reporting period, the permittee shall state so in the report.
4. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month HAPs emissions limitations in Section A.2.c. If no deviations occurred during the reporting period, the permittee shall state so in the report.
5. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Terms and Conditions of this permit.

**E. Testing Requirements**

1. Compliance with the emission limitations in Sections A.1 and 2 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:  
106.8 lbs/day of VOC  
  
Applicable Compliance Method:  
The daily VOC emission rate is based on the emission unit's potential to emit. The potential to emit was calculated by: (maximum production rate in pounds per hour) x (the percent by weight VOC) x (emission factor of 1.5%).
  - b. Emission Limitation:  
13.3 lbs/day of PE-PM10.  
  
Applicable Compliance Method:  
The daily PE-PM10 emission rate is based on the emissions unit's potential to emit. The potential to emit was calculated by: (maximum production rate in pounds per hour) x (the percent by weight PM) x (emission factor of 1.0%).
  - c. Emission Limitation:  
The amount of volatile organic compounds (VOC) used based upon the solvent input rate equation listed in term A.2.b shall not exceed 39.9 tons for emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027 combined, based upon a rolling, 12-month summation.  
  
Applicable Compliance Method:  
Compliance with the annual volatile organic compound used limitation based upon the solvent input rate equation listed in term A.2.b shall be based upon the record keeping requirements as specified in Section C.1.
  - d. Emission Limitation:  
Volatile organic compound (VOC) emissions shall not exceed 39.9 TPY for emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027 combined, based upon a rolling, 12-month summation  
  
Applicable Compliance Method:  
Compliance with the annual volatile organic compound emission limitations in term A.1 shall be based upon the record keeping requirements as specified in Section C.1.
  - e. Emission Limitation:  
2.42 TPY of PE-PM10.  
  
Applicable Compliance Limitation:  
Compliance with the annual particulate emission limitations in term A.1 shall be based upon the record keeping requirements as specified in Section C.2.
  - f. Emissions Limitations:  
9.9 TPY for any single HAP and 24.9 TPY for combined HAPs.  
  
Applicable Compliance Method:  
Compliance with the HAP emission limitations in term A.2.c will be determined by the record keeping requirements specified in Section C.3.
  - g. Emissions Limitations:  
Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule.  
  
Fugitive visible particulate emissions shall not exceed twenty percent (20%) opacity, as a three-minute average.  
  
Applicable Compliance Method  
Compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

**F. Miscellaneous Requirements**

1. The following terms and conditions of this permit are federally enforceable: A, B, C, D, and E.

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

Facility ID: 1431480257 Emissions Unit ID: P012 Issuance type: Final State Permit To Operate

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**Part II - Special Terms and Conditions**

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.

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P012 - High Speed Dispersion Mixer 103	OAC rule 3745-31-05(A)(3) (PTI 14-05553)	Volatile organic compound (VOC) emissions from the mixer shall not exceed 133.4 pounds per day.  Particulate emissions (PE) from the mixer shall not exceed 16.6 pounds per day and 3.03 tons per year (TPY).  PE = PM10  See Section A.2.a.
	OAC rule 3745-31-05(C)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1), OAC rule 3745-17-07(B)(1), OAC rule 3745-17-08(B) and OAC rule 3745-31-05(C).  Volatile organic compound (VOC) emissions shall not exceed 39.9 TPY for emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027 combined, based upon a rolling, 12-month summation.
	OAC rule 3745-17-07(A)(1)	See Sections A.2.b and A.2.c.
	OAC rule 3745-17-07(B)(1)	See Section A.2.d.
	OAC rule 3745-17-08(B)	See Section A.2.e.  The permittee shall minimize or eliminate visible particulate emissions by the use of a cover and dust collector.
OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the requirements of OAC rule 3745-31-05(A)(3).	

**2. Additional Terms and Conditions**

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

The permittee shall not use, by weight of VOC emitted more than 39.9 tons of VOC per rolling, 12-month period based upon the monthly solvent input rate as depicted in the following equation, to emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027 combined.

Monthly solvent input rate = (A x B x C)/2000 where A = the number of pounds of each paint mixed per month, B = the percent by weight of solvent of each paint mixed, and C = 0.015 (emission factor for amount of VOC emitted in lbs of VOC per lbs of solvent in the paint).

The permittee has existing records to demonstrate compliance upon issuance of the permit. The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024

and P027 shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation. Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six- minute average, except as specified by rule. Fugitive visible particulate emissions shall not exceed 20 percent opacity, as a three- minute average. The daily VOC and the daily and annual PE-PM10 emissions limitations outlined are based upon the emissions unit's Potential To Emit (PTE). Therefore, no records are required to demonstrate compliance with these limits.

**B. Operational Restrictions**

1. None

**C. Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information each month for emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027:
  - a. The name and identification of each batch of paint produced.
  - b. The amount of each paint produced, in pounds.
  - c. The percent by weight of VOC of each paint mixed.
  - d. The total combined monthly amount of VOC emissions (emitted) based upon the solvent input rate equation listed in term A.2.b, in tons per month.
  - e. The updated rolling, 12-month summation of VOC emissions based upon the solvent input rate equation listed in term A.2.b (the summation of the amount of the current month's emission total and the previous eleven calendar months emission totals).
  - f. The total combined monthly VOC emissions, in tons per month.
  - g. The updated rolling, 12-month summation of VOC emissions (the summation of the current month's emission total and the previous eleven calendar months emission totals).
2. The permittee shall collect and record the following information each month for determining the particulate matter emissions:
  - a. The name and identification of each batch of paint produced.
  - b. The total amount of solids used in the formulation of paints, in pounds.
  - c. The total monthly PM emissions, in tons per month.
3. The permittee shall collect and record the following information each month for emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027:
  - a. The name and identification number of each batch of paint produced containing a HAP(s).
  - b. The number of pounds of each batch of paint produced.
  - c. The individual Hazardous Air Pollutant (HAP) content for each HAP per pound of paint produced in pounds of individual HAP per pound of paint.
  - d. The total combined HAP content of each paint in pounds of combined HAPs per pound of paint [sum all the individual HAP contents from (c)].
  - e. The total individual HAP emissions for each HAP from all paints employed in pounds or tons per month [for each individual HAP, the summation of (b) x 1.5 percent x (c)].
  - f. The total combined HAP emissions from all paints employed in pounds or tons per month [the summation of (b) x 1.5 percent x (d)].
  - g. The updated rolling, 12-month summation for individual HAP emissions for each HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
  - h. The updated rolling, 12-month summation for total combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.

**D. Reporting Requirements**

1. The permittee shall submit annual reports which specify the total organic compound emissions from emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027. These reports shall be submitted by January 30 of each year and cover the previous calendar year.
2. The permittee shall submit annual reports which specify the particulate matter emissions from this emissions units. These reports shall be submitted by January 30 of each year and cover the previous calendar year.
3. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the 12-month VOC emissions limitations listed in Section A.1 and the usage limitation in Section A.2.b. If no deviations occurred during the reporting period, the permittee shall state so in the report.
4. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of

Environmental Services which identify all exceedances of the rolling, 12-month HAPs emissions limitations in Section A.2.c. If no deviations occurred during the reporting period, the permittee shall state so in the report.

5. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Terms and Conditions of this permit.

**E. Testing Requirements**

1. Compliance with the emission limitations in Sections A.1 and 2 of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:  
133.4 lbs/day of VOC

Applicable Compliance Method:

The daily VOC emission rate is based on the emission unit's potential to emit. The potential to emit was calculated by: (maximum production rate in pounds per hour) x (the percent by weight VOC) x (emission factor of 1.5%).

b. Emission Limitation:  
16.6 lbs/day of PE-PM10.

Applicable Compliance Method:

The daily PE-PM10 emission rate is based on the emissions unit's potential to emit. The potential to emit was calculated by: (maximum production rate in pounds per hour) x (the percent by weight PM) x (emission factor of 1.0%).

c. Emission Limitation:

Volatile organic compounds (VOC) emissions based upon the solvent input rate equation listed in term A.2.b shall not exceed 39.9 TPY for emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027 combined, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the annual volatile organic compound emissions limitation based upon the solvent input rate equation listed in term A.2.b shall be based upon the record keeping requirements as specified in Section C.1.

d. Emission Limitation:

Volatile organic compound (VOC) emissions shall not exceed 39.9 TPY for emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027 combined, based upon a rolling, 12-month summation

Applicable Compliance Method:

Compliance with the annual volatile organic compound emission limitations in term A.1 shall be based upon the record keeping requirements as specified in Section C.1.

e. Emission Limitation:  
3.03 TPY of PE-PM10.

Applicable Compliance Limitation:

Compliance with the annual particulate emission limitations in term A.1 shall be based upon the record keeping requirements as specified in Section C.2.

f. Emissions Limitations:

9.9 TPY for any single HAP and 24.9 TPY for combined HAPs.

Applicable Compliance Method:

Compliance with the HAP emission limitations in term A.2.c will be determined by the record keeping requirements specified in Section C.3.

g. Emissions Limitations:

Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule.

Fugitive visible particulate emissions shall not exceed twenty percent (20%) opacity, as a three-minute average.

Applicable Compliance Method

Compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

**F. Miscellaneous Requirements**

1. The following terms and conditions of this permit are federally enforceable: A, B, C, D, and E.

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

**Facility ID: 1431480257 Emissions Unit ID: P013 Issuance type: Final State Permit To Operate**

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**Part II - Special Terms and Conditions**

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.

**A. Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P013 - High Speed Dispersion Mixer 101	OAC rule 3745-31-05(A)(3) (PTI 14-05553)	Volatile organic compound (VOC) emissions from the mixer shall not exceed 44.5 pounds per day.  Particulate emissions (PE) from the mixer shall not exceed 5.6 pounds per day and 1.02 tons per year (TPY).  PE = PM10  See Section A.2.a.
	OAC rule 3745-31-05(C)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1), OAC rule 3745-17-07(B)(1), OAC rule 3745-17-08(B) and OAC rule 3745-31-05(C).  Volatile organic compound (VOC) emissions shall not exceed 39.9 TPY for emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027 combined, based upon a rolling, 12-month summation.
	OAC rule 3745-17-07(A)(1)	See Sections A.2.b and A.2.c.
	OAC rule 3745-17-07(B)(1)	See Section A.2.d.
	OAC rule 3745-17-08(B)	See Section A.2.e. The permittee shall minimize or eliminate visible particulate emissions by the use of a cover and dust collector.
OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the requirements of OAC rule 3745-31-05(A)(3).	

**2. Additional Terms and Conditions**

- (a) Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emissions limitations and use of a cover and dust collector.  
Paint production shall not result in an exceedance of the following emission limitations and /or control requirements:  
  
The permittee shall not use, by weight of VOC emitted more than 39.9 tons of VOC per rolling, 12-month period based upon the monthly solvent input rate as depicted in the following equation to emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027 combined.  
  
Monthly solvent input rate = (A x B x C)/2000 where A = the number of pounds of each paint mixed per month, B = the percent by weight of solvent of each paint mixed, and C = 0.015 (emission factor for amount of VOC emitted in lbs of VOC per lbs of solvent in the paint).  
  
The permittee has existing records to demonstrate compliance upon issuance of the permit. The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027 shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation. Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six- minute average, except as specified by rule. Fugitive visible particulate emissions shall not exceed 20 percent opacity, as a three- minute average. The daily VOC and the daily and annual PE-PM10 emissions limitations outlined are based upon the emissions unit's Potential To Emit (PTE). Therefore, no records are required to demonstrate compliance with these limits.

**B. Operational Restrictions**

- 1. None

**C. Monitoring and/or Record Keeping Requirements**

- 1. The permittee shall collect and record the following information each month for emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027:

- a. The name and identification of each batch of paint produced.
  - b. The amount of each paint produced, in pounds.
  - c. The percent by weight of VOC of each paint mixed.
  - d. The total combined monthly amount of VOC emissions (emitted) based upon the solvent input rate equation listed in term A.2.b, in tons per month.
  - e. The updated rolling, 12-month summation of VOC emissions based upon the solvent input rate equation listed in term A.2.b (the summation of the amount of current month's emission total and the previous eleven calendar months emission totals).
  - f. The total combined monthly VOC emissions, in tons per month.
  - g. The updated rolling, 12-month summation of VOC emissions (the summation of the current month's emission total and the previous eleven calendar months emission totals).
2. The permittee shall collect and record the following information each month for determining the particulate matter emissions:
  - a. The name and identification of each batch of paint produced.
  - b. The total amount of solids used in the formulation of paints, in pounds.
  - c. The total monthly PM emissions, in tons per month.
3. The permittee shall collect and record the following information each month for emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027:
  - a. The name and identification number of each batch of paint produced containing a HAP(s).
  - b. The number of pounds of each batch of paint produced.
  - c. The individual Hazardous Air Pollutant (HAP) content for each HAP per pound of paint produced in pounds of individual HAP per pound of paint.
  - d. The total combined HAP content of each paint in pounds of combined HAPs per pound of paint [sum all the individual HAP contents from (c)].
  - e. The total individual HAP emissions for each HAP from all paints employed in pounds or tons per month [for each individual HAP, the summation of (b) x 1.5 percent x (c)].
  - f. The total combined HAP emissions from all paints employed in pounds or tons per month [the summation of (b) x 1.5 percent x (d)].
  - g. The updated rolling, 12-month summation for individual HAP emissions for each HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
  - h. The updated rolling, 12-month summation for total combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.

**D. Reporting Requirements**

1. The permittee shall submit annual reports which specify the total organic compound emissions from emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027. These reports shall be submitted by January 30 of each year and cover the previous calendar year.
2. The permittee shall submit annual reports which specify the particulate matter emissions from this emissions units. These reports shall be submitted by January 30 of each year and cover the previous calendar year.
3. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the 12-month VOC emissions limitations listed in Sections A.1 and the usage limitation in Section A.2.b. If no deviations occurred during the reporting period, the permittee shall state so in the report.
4. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month HAPs emissions limitations in Section A.2.c. If no deviations occurred during the reporting period, the permittee shall state so in the report.
5. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Terms and Conditions of this permit.

**E. Testing Requirements**

1. Compliance with the emission limitations in Sections A.1 and 2 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:  
44.5 lbs/day of VOC
  - Applicable Compliance Method:  
The daily VOC emission rate is based on the emission unit's potential to emit. The potential to emit was calculated by: (maximum production rate in pounds per hour) x (the percent by weight VOC) x (emission factor

of 1.5%).

b. Emission Limitation:  
5.6 lbs/day of PE-PM10.

Applicable Compliance Method:

The daily PE-PM10 emission rate is based on the emissions unit's potential to emit. The potential to emit was calculated by: (maximum production rate in pounds per hour) x (the percent by weight PM) x (emission factor of 1.0%).

c. Emission Limitation:

Volatile organic compounds (VOC) emissions based upon the solvent input rate equation listed in term A.2.b shall not exceed 39.9 TPY for emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027 combined, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the annual volatile organic compound emissions limitation based upon the solvent input rate equation listed in term A.2.b shall be based upon the record keeping requirements as specified in Section C.1.

d. Emission Limitation:

Volatile organic compound (VOC) emissions shall not exceed 39.9 TPY for emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027 combined, based upon a rolling, 12-month summation

Applicable Compliance Method:

Compliance with the annual volatile organic compound emission limitations in term A.1 shall be based upon the record keeping requirements as specified in Section C.1.

e. Emission Limitation:

1.02 TPY of PE-PM10.

Applicable Compliance Limitation:

Compliance with the annual particulate emission limitations in term A.1 shall be based upon the record keeping requirements as specified in Section C.2.

f. Emissions Limitations:

9.9 TPY for any single HAP and 24.9 TPY for combined HAPs.

Applicable Compliance Method:

Compliance with the HAP emission limitations in term A.2.c will be determined by the record keeping requirements specified in Section C.3.

g. Emissions Limitations:

Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule.

Fugitive visible particulate emissions shall not exceed twenty percent (20%) opacity, as a three-minute average.

Applicable Compliance Method

Compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

#### F. Miscellaneous Requirements

- The following terms and conditions of this permit are federally enforceable: A, B, C, D, and E.

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

**Facility ID: 1431480257 Emissions Unit ID: P016 Issuance type: Final State Permit To Operate**

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#### Part II - Special Terms and Conditions

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).

- 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.
  - None.
- 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.
  - None.

#### A. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P016 - High Speed Dispersion Mixer 126	OAC rule 3745-31-05(A)(3) (PTI 14-05553)	<p>Volatile organic compound (VOC) emissions from the mixer shall not exceed 147.5 pounds per day.</p> <p>Particulate emissions (PE) from the mixer shall not exceed 18.5 pounds per day and 3.37 tons per year (TPY).</p> <p>PE = PM10</p> <p>See Section A.2.a.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1), OAC rule 3745-17-07(B)(1), OAC rule 3745-17-08(B) and OAC rule 3745-31-05(C).</p>
	OAC rule 3745-31-05(C)	<p>Volatile organic compound (VOC) emissions shall not exceed 39.9 TPY for emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027 combined, based upon a rolling, 12-month summation.</p> <p>See Sections A.2.b and A.2.c.</p>
	OAC rule 3745-17-07(A)(1)	See Section A.2.d.
	OAC rule 3745-17-07(B)(1)	See Section A.2.e.
	OAC rule 3745-17-08(B)	The permittee shall minimize or eliminate visible particulate emissions by the use of a cover and dust collector.
	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the requirements of OAC rule 3745-31-05(A)(3).

**2. Additional Terms and Conditions**

- (a) Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emissions limitations and use of a cover and dust collector.  
 Paint production shall not result in an exceedance of the following emission limitations and /or control requirements:  
  
 The permittee shall not use, by weight of VOC emitted more than 39.9 tons of VOC per rolling, 12-month period based upon the monthly solvent input rate as depicted in the following equation to emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027 combined.  
  

$$\text{Monthly solvent input rate} = (A \times B \times C) / 2000$$
 where A = the number of pounds of each paint mixed per month, B = the percent by weight of solvent of each paint mixed, and C = 0.015 (emission factor for amount of VOC emitted in lbs of VOC per lbs of solvent in the paint).  
  
 The permittee has existing records to demonstrate compliance upon issuance of the permit. The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027 shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation. Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six- minute average, except as specified by rule. Fugitive visible particulate emissions shall not exceed 20 percent opacity, as a three- minute average. The daily VOC and the daily and annual PE-PM10 emissions limitations outlined are based upon the emissions unit's Potential To Emit (PTE). Therefore, no records are required to demonstrate compliance with these limits.

**B. Operational Restrictions**

- 1. None

**C. Monitoring and/or Record Keeping Requirements**

- 1. The permittee shall collect and record the following information each month for emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027:
  - a. The name and identification of each batch of paint produced.
  - b. The amount of each paint produced, in pounds.
  - c. The percent by weight of VOC of each paint mixed.
  - d. The total combined monthly amount of VOC emissions (emitted) based upon the solvent input rate equation listed in term A.2.b, in tons per month.
  - e. The updated rolling, 12-month summation of VOC emissions based upon the solvent input rate equation listed in term A.2.b (the summation of the amount of the current month's emission total and the previous eleven calendar months emission totals).
  - f. The total combined monthly VOC emissions, in tons per month.

- g. The updated rolling, 12-month summation of VOC emissions (the summation of the current month's emission total and the previous eleven calendar months emission totals).
2. The permittee shall collect and record the following information each month for determining the particulate matter emissions:
- The name and identification of each batch of paint produced.
  - The total amount of solids used in the formulation of paints, in pounds.
  - The total monthly PM emissions, in tons per month.
3. The permittee shall collect and record the following information each month for emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027:
- The name and identification number of each batch of paint produced containing a HAP(s).
  - The number of pounds of each batch of paint produced.
  - The individual Hazardous Air Pollutant (HAP) content for each HAP per pound of paint produced in pounds of individual HAP per pound of paint.
  - The total combined HAP content of each paint in pounds of combined HAPs per pound of paint [sum all the individual HAP contents from (c)].
  - The total individual HAP emissions for each HAP from all paints employed in pounds or tons per month [for each individual HAP, the summation of (b) x 1.5 percent x (c)].
  - The total combined HAP emissions from all paints employed in pounds or tons per month [the summation of (b) x 1.5 percent x (d)].
  - The updated rolling, 12-month summation for individual HAP emissions for each HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
  - The updated rolling, 12-month summation for total combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.

4. The permit to install for this emissions unit (P016) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: toluene

TLV (ug/m3): 188,400

Maximum Hourly Emission Rate (lbs/hr): 59.89

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 4318

MAGLC (ug/m3): 4486

Physical changes to or in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

- Changes in the composition of the materials used, or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- Physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

- a. A description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. When the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

**D. Reporting Requirements**

1. The permittee shall submit annual reports which specify the total organic compound emissions from emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027. These reports shall be submitted by January 30 of each year and cover the previous calendar year.
2. The permittee shall submit annual reports which specify the particulate matter emissions from this emissions units. These reports shall be submitted by January 30 of each year and cover the previous calendar year.
3. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the 12-month VOC emissions limitations listed in Section A.1 and the usage limitation in Section A.2.b. If no deviations occurred during the reporting period, the permittee shall state so in the report.
4. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month HAPs emissions limitations in Section A.2.c. If no deviations occurred during the reporting period, the permittee shall state so in the report.
5. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Terms and Conditions of this permit.

**E. Testing Requirements**

1. Compliance with the emission limitations in Sections A.1 and 2 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:  
147.5 lbs/day of VOC  
  
Applicable Compliance Method:  
The daily VOC emission rate is based on the emission unit's potential to emit. The potential to emit was calculated by: (maximum production rate in pounds per hour) x (the percent by weight VOC) x (emission factor of 1.5%).
  - b. Emission Limitation:  
18.5 lbs/day of PE-PM10.  
  
Applicable Compliance Method:  
The daily PE-PM10 emission rate is based on the emissions unit's potential to emit. The potential to emit was calculated by: (maximum production rate in pounds per hour) x (the percent by weight PM) x (emission factor of 1.0%).
  - c. Emission Limitation:  
Volatile organic compounds (VOC) emissions based upon the solvent input rate equation listed in term A.2.b shall not exceed 39.9 TPY for emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027 combined, based upon a rolling, 12-month summation.  
  
Applicable Compliance Method:  
Compliance with the annual volatile organic compound emissions limitation based upon the solvent input rate equation listed in term A.2.b shall be based upon the record keeping requirements as specified in Section C.1.
  - d. Emission Limitation:  
Volatile organic compound (VOC) emissions shall not exceed 39.9 TPY for emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027 combined, based upon a rolling, 12-month summation  
  
Applicable Compliance Method:  
Compliance with the annual volatile organic compound emission limitations in term A.1 shall be based upon the record keeping requirements as specified in Section C.1.
  - e. Emission Limitation:  
3.37 TPY of PE-PM10.  
  
Applicable Compliance Limitation:  
Compliance with the annual particulate emission limitations in term A.1 shall be based upon the record keeping requirements as specified in Section C.2.
  - f. Emissions Limitations:  
9.9 TPY for any single HAP and 24.9 TPY for combined HAPs.  
  
Applicable Compliance Method:  
Compliance with the HAP emission limitations in term A.2.c will be determined by the record keeping requirements specified in Section C.3.
  - g. Emissions Limitations:  
Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule.  
  
Fugitive visible particulate emissions shall not exceed twenty percent (20%) opacity, as a three-minute average.

Applicable Compliance Method

Compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

F. **Miscellaneous Requirements**

1. The terms and conditions in this permit supersede Permit to Install 14-4437, as issued on January 28, 1998 and modified on January 3, 2002.
2. The following terms and conditions of this permit are federally enforceable: A, B, C.1 - C.3, D, and E.

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

Facility ID: 1431480257 Emissions Unit ID: P017 Issuance type: Final State Permit To Operate

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**Part II - Special Terms and Conditions**

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.

A. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P017 - High Speed Dispersion Mixer 130	OAC rule 3745-31-05(A)(3) (PTI 14-05553)	Volatile organic compound (VOC) emissions from the mixer shall not exceed 146.7 pounds per day.  Particulate emissions (PE) from the mixer shall not exceed 18.5 pounds per day and 3.37 tons per year (TPY).  PE = PM10  See Section A.2.a.  The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1), OAC rule 3745-17-07(B)(1), OAC rule 3745-17-08(B) and OAC rule 3745-31-05(C).
	OAC rule 3745-31-05(C)	Volatile organic compound (VOC) emissions shall not exceed 39.9 TPY for emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027 combined, based upon a rolling, 12-month summation.  See Sections A.2.b and A.2.c.
	OAC rule 3745-17-07(A)(1) OAC rule 3745-17-07(B)(1) OAC rule 3745-17-08(B)	See Section A.2.d. See Section A.2.e. The permittee shall minimize or eliminate visible particulate emissions by the use of a cover and dust collector.
	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the requirements of OAC rule 3745-31-05(A)(3).

2. **Additional Terms and Conditions**

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

The permittee shall not use, by weight of VOC emitted more than 39.9 tons of VOC per rolling, 12-month period based upon the monthly solvent input rate as depicted in the following equation, to emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027 combined.

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

The permittee has existing records to demonstrate compliance upon issuance of the permit. The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027 shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation. Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule. Fugitive visible particulate emissions shall not exceed 20 percent opacity, as a three-minute average. The daily VOC and the daily and annual PE-PM10 emissions limitations outlined are based upon the emissions unit's Potential To Emit (PTE). Therefore, no records are required to demonstrate compliance with these limits.

**B. Operational Restrictions**

1. None

**C. Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information each month for emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027:
  - a. The name and identification of each batch of paint produced.
  - b. The amount of each paint produced, in pounds.
  - c. The percent by weight of VOC of each paint mixed.
  - d. The total combined monthly amount of VOC emissions (emitted) based upon the solvent input rate equation listed in term A.2.b, in tons per month.
  - e. The updated rolling, 12-month summation of the amount of VOC emissions based upon the solvent input rate equation listed in term A.2.b (the summation of the current month's emission total and the previous eleven calendar months emission totals).
  - f. The total combined monthly VOC emissions, in tons per month.
  - g. The updated rolling, 12-month summation of VOC emissions (the summation of the current month's emission total and the previous eleven calendar months emission totals).
2. The permittee shall collect and record the following information each month for determining the particulate matter emissions:
  - a. The name and identification of each batch of paint produced.
  - b. The total amount of solids used in the formulation of paints, in pounds.
  - c. The total monthly PM emissions, in tons per month.
3. The permittee shall collect and record the following information each month for emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027:
  - a. The name and identification number of each batch of paint produced containing a HAP(s).
  - b. The number of pounds of each batch of paint produced.
  - c. The individual Hazardous Air Pollutant (HAP) content for each HAP per pound of paint produced in pounds of individual HAP per pound of paint.
  - d. The total combined HAP content of each paint in pounds of combined HAPs per pound of paint [sum all the individual HAP contents from (c)].
  - e. The total individual HAP emissions for each HAP from all paints employed in pounds or tons per month [for each individual HAP, the summation of (b) x 1.5 percent x (c)].
  - f. The total combined HAP emissions from all paints employed in pounds or tons per month [the summation of (b) x 1.5 percent x (d)].
  - g. The updated rolling, 12-month summation for individual HAP emissions for each HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
  - h. The updated rolling, 12-month summation for total combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.
4. The permit to install for this emissions unit (P017) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was

applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: toluene

TLV (ug/m3): 188,400

Maximum Hourly Emission Rate (lbs/hr): 59.89

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 4318

MAGLC (ug/m3): 4486

Physical changes to or in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

a. Changes in the composition of the materials used, or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

a. A description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. When the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

#### D. Reporting Requirements

1. The permittee shall submit annual reports which specify the total organic compound emissions from emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027. These reports shall be submitted by January 30 of each year and cover the previous calendar year.
2. The permittee shall submit annual reports which specify the particulate matter emissions from this emissions units. These reports shall be submitted by January 30 of each year and cover the previous calendar year.
3. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the 12-month VOC emissions limitations listed in Section A.1 and the usage limitation in Section A.2.b. If no deviations occurred during the reporting period, the permittee shall state so in the report.
4. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month HAPs emissions limitations in Section A.2.c. If no deviations occurred during the reporting period, the permittee shall state so in the report.
5. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Terms and Conditions of this permit.

#### E. Testing Requirements

1. Compliance with the emission limitations in Sections A.1 and 2 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:  
146.7 lbs/day of VOC
  - Applicable Compliance Method:  
The daily VOC emission rate is based on the emission unit's potential to emit. The potential to emit was calculated by: (maximum production rate in pounds per hour) x (the percent by weight VOC) x (emission factor of 1.5%).
  - b. Emission Limitation:  
18.5 lbs/day of PE-PM10.

**Applicable Compliance Method:**

The daily PE-PM10 emission rate is based on the emissions unit's potential to emit. The potential to emit was calculated by: (maximum production rate in pounds per hour) x (the percent by weight PM) x (emission factor of 1.0%).

**c. Emission Limitation:**

Volatile organic compounds (VOC) emissions based upon the solvent input rate equation listed in term A.2.b shall not exceed 39.9 TPY for emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027 combined, based upon a rolling, 12-month summation.

**Applicable Compliance Method:**

Compliance with the annual volatile organic compound emissions limitation based upon the solvent input rate equation listed in term A.2.b shall be based upon the record keeping requirements as specified in Section C.1.

**d. Emission Limitation:**

Volatile organic compound (VOC) emissions shall not exceed 39.9 TPY for emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027 combined, based upon a rolling, 12-month summation

**Applicable Compliance Method:**

Compliance with the annual volatile organic compound emission limitations in term A.1 shall be based upon the record keeping requirements as specified in Section C.1.

**e. Emission Limitation:**

3.37 TPY of PE-PM10.

**Applicable Compliance Limitation:**

Compliance with the annual particulate emission limitations in term A.1 shall be based upon the record keeping requirements as specified in Section C.2.

**f. Emissions Limitations:**

9.9 TPY for any single HAP and 24.9 TPY for combined HAPs.

**Applicable Compliance Method:**

Compliance with the HAP emission limitations in term A.2.c will be determined by the record keeping requirements specified in Section C.3.

**g. Emissions Limitations:**

Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule.

Fugitive visible particulate emissions shall not exceed twenty percent (20%) opacity, as a three-minute average.

**Applicable Compliance Method**

Compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

**F. Miscellaneous Requirements**

1. The terms and conditions in this permit supersede Permit to Install 14-4437, as issued on January 28, 1998 and modified on January 3, 2002.
2. The following terms and conditions of this permit are federally enforceable: A, B, C.1 - C.3, D, and E.

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

**Facility ID: 1431480257 Emissions Unit ID: P021 Issuance type: Final State Permit To Operate**

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**Part II - Special Terms and Conditions**

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.

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control</u>
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P021 - Iraki Ring Mill 129

OAC rule 3745-31-05(A)(3)  
(PTI 14-05553)

**Measures**

Volatile organic compound (VOC) emissions from the mill shall not exceed 213.3 pounds per day.

See Section A.2.a.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C).

OAC rule 3745-31-05(C)

Volatile organic compound (VOC) emissions shall not exceed 39.9 TPY for emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027 combined, based upon a rolling, 12-month summation.

See Sections A.2.b and A.2.c.

**2. Additional Terms and Conditions**

- (a) Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emissions limitations.  
Paint production shall not result in an exceedance of the following emission limitations and /or control requirements:

The permittee shall not use, by weight of VOC emitted more than 39.9 tons of VOC per rolling, 12-month period based upon the monthly solvent input rates as depicted in the following equation to emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027 combined.

Monthly solvent input rate = (A x B x C)/2000 where A = the number of pounds of each paint mixed/milled per month, B = the percent by weight of solvent of each paint mixed/milled, and C = 0.015 (emission factor for amount of VOC emitted in lbs of VOC per lb of solvent in the paint).

The permittee has existing records to demonstrate compliance upon issuance of the permit. The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027 shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation. The daily VOC emissions limitation outlined is based upon the emissions unit's Potential To Emit (PTE). Therefore, no records are required to demonstrate compliance with this limit.

**B. Operational Restrictions**

- 1. None

**C. Monitoring and/or Record Keeping Requirements**

- 1. The permittee shall collect and record the following information each month for emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027:
  - a. The name and identification of each batch of paint produced.
  - b. The amount of each paint produced, in pounds.
  - c. The percent by weight of VOC of each paint mixed/milled.
  - d. The total combined monthly amount of VOC emissions (emitted) based upon the solvent input rate equation listed in term A.2.b, in tons per month.
  - e. The updated rolling, 12-month summation of VOC emissions based upon the solvent input rate equation listed in term A.2.b (the summation of the amount of the current month's emission total and the previous eleven calendar months emission totals).
  - f. The total combined monthly VOC emissions, in tons per month.
  - g. The updated rolling, 12-month summation of VOC emissions (the summation of the current month's emission total and the previous eleven calendar months emission totals).
- 2. The permittee shall collect and record the following information each month for emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027:
  - a. The name and identification number of each batch of paint produced containing a HAP(s).
  - b. The number of pounds of each batch of paint produced.
  - c. The individual Hazardous Air Pollutant (HAP) content for each HAP per pound of paint produced in pounds of individual HAP per pound of paint.
  - d. The total combined HAP content of each paint in pounds of combined HAPs per pound of paint [sum all the individual HAP contents from (c)].
  - e. The total individual HAP emissions for each HAP from all paints employed in pounds or tons per month [for each individual HAP, the summation of (b) x 1.5 percent x (c)].
  - f. The total combined HAP emissions from all paints employed in pounds or tons per month [the summation of (b) x 1.5 percent x (d)].
  - g. The updated rolling, 12-month summation for individual HAP emissions for each HAP, in pounds or tons. This

shall include the information for the current month and the preceding eleven calendar months.

h. The updated rolling, 12-month summation for total combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.

3. The permit to install for this emissions unit (P021) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: toluene

TLV (ug/m3): 188,400

Maximum Hourly Emission Rate (lbs/hr): 59.89

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 4318

MAGLC (ug/m3): 4486

Physical changes to or in the method of operation of the emissions unit after it's installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

a. Changes in the composition of the materials used, or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(AAA)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (AAA)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

a. A description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. Documentation of it's evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. When the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

a. A description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. Documentation of it's evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. When the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

#### D. Reporting Requirements

1. The permittee shall submit annual reports which specify the total organic compound emissions from emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027. These reports shall be submitted by January 30 of each year and cover the previous calendar year.

2. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the 12-month VOC emissions limitations listed in Section A.1 and the usage limitation in Section A.2.b. If no deviations occurred during the reporting period, the permittee shall state so in the report.
3. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month HAPs emissions limitations in Section A.2.c. If no deviations occurred during the reporting period, the permittee shall state so in the report.
4. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Terms and Conditions of this permit.

**E. Testing Requirements**

1. Compliance with the emission limitations in Sections A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:  
213.3 lbs/day of VOC  
  
Applicable Compliance Method:  
The daily VOC emission rate is based on the emission unit's potential to emit. The potential to emit was calculated by: (maximum production rate in pounds per hour) x (the percent by weight VOC content of the paint) x (emission factor of 1.5%).
  - b. Emission Limitation:  
Volatile organic compound (VOC) emissions based upon the solvent input rate equation listed in term A.2.b shall not exceed 39.9 TPY for emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027 combined, based upon a rolling, 12-month summation.  
  
Applicable Compliance Method:  
Compliance with the annual volatile organic compound emission based upon the solvent input rate equation listed in term A.2.b shall be based upon the record keeping requirements as specified in Section C.1.
  - c. Emission Limitation:  
Volatile organic compounds (VOC) emissions shall not exceed 39.9 TPY for emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027 combined, based upon a rolling, 12-month summation.  
  
Applicable Compliance Method:  
Compliance with the annual volatile organic compound input rate emissions limitations in term A.1 shall be based upon the record keeping requirements as specified in Section C.1.
  - d. Emissions Limitations:  
9.9 TPY for any single HAP and 24.9 TPY for combined HAPs  
  
Applicable Compliance Method:  
Compliance with the HAP emission limitations in term A.2.c shall be determined by the record keeping requirements specified in Section C.2.

**F. Miscellaneous Requirements**

1. The terms and conditions in this permit supersede Permit to Install 14-04808, as issued on November 10, 1999.
2. The following terms and conditions of this permit are federally enforceable: A, B, C.1 and C.2, D, and E.

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

**Facility ID: 1431480257 Emissions Unit ID: P022 Issuance type: Final State Permit To Operate**

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**Part II - Special Terms and Conditions**

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.

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P022 - Horizontal Media Mill 123	OAC rule 3745-31-05(A)(3) (PTI 14-05553)	<p>Volatile organic compound (VOC) emissions from the mill shall not exceed 4.0 pounds per day.</p> <p>See Section A.2.a.</p>
	OAC rule 3745-31-05(C)	<p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C). Volatile organic compound (VOC) emissions shall not exceed 39.9 TPY for emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027 combined, based upon a rolling, 12-month summation.</p> <p>See Sections A.2.b and A.2.c.</p>

**2. Additional Terms and Conditions**

- (a) Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emissions limitations.  
 Paint production shall not result in an exceedance of the following emission limitations and /or control requirements:  
  
 The permittee shall not use, by weight of VOC emitted more than 39.9 tons of VOC per rolling, 12-month period based upon the monthly solvent input rate as depicted in the following equation, to emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027 combined.  
  

$$\text{Monthly solvent input rate} = (A \times B \times C) / 2000$$
 where A = the number of pounds of each paint mixed/milled per month, B = the percent by weight of solvent of each paint mixed/milled, and C = 0.015 (emission factor for amount of VOC emitted in lbs of VOC per lb of solvent in the paint).  
  
 The permittee has existing records to demonstrate compliance upon issuance of the permit. The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027 shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation. The daily VOC emissions limitation outlined is based upon the emissions unit's Potential To Emit (PTE). Therefore, no records are required to demonstrate compliance with this limit.

**B. Operational Restrictions**

- 1. None

**C. Monitoring and/or Record Keeping Requirements**

- 1. The permittee shall collect and record the following information each month for emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027:
  - a. The name and identification of each batch of paint produced.
  - b. The amount of each paint produced, in pounds.
  - c. The percent by weight of VOC of each paint mixed/milled.
  - d. The total combined monthly amount of VOC emissions (emitted) based upon the solvent input rate equation listed in term A.2.b, in tons per month.
  - e. The updated rolling, 12-month summation of VOC emissions based upon the solvent input rate equation listed in term A.2.b (the summation of the amount of the current month's emission total and the previous eleven calendar months emission totals).
  - f. The total combined monthly VOC emissions, in tons per month.
  - g. The updated rolling, 12-month summation of VOC emissions (the summation of the current month's emission total and the previous eleven calendar months emission totals).
- 2. The permittee shall collect and record the following information each month for emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027:
  - a. The name and identification number of each batch of paint produced containing a HAP(s).
  - b. The number of pounds of each batch of paint produced.
  - c. The individual Hazardous Air Pollutant (HAP) content for each HAP per pound of paint produced in pounds of individual HAP per pound of paint.
  - d. The total combined HAP content of each paint in pounds of combined HAPs per pound of paint [sum all the individual HAP contents from (c)].
  - e. The total individual HAP emissions for each HAP from all paints employed in pounds or tons per month [for each individual HAP, the summation of (b) x 1.5 percent x (c)].
  - f. The total combined HAP emissions from all paints employed in pounds or tons per month [the summation of (b) x 1.5 percent x (d)].

g. The updated rolling, 12-month summation for individual HAP emissions for each HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

h. The updated rolling, 12-month summation for total combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.

3. The permit to install for this emissions unit (P022) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: toluene

TLV (ug/m3): 188,400

Maximum Hourly Emission Rate (lbs/hr): 59.89

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 4318

MAGLC (ug/m3): 4486

Physical changes to or in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

a. Changes in the composition of the materials used, or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

a. A description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. When the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

#### D. Reporting Requirements

1. The permittee shall submit annual reports which specify the total organic compound emissions from emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027. These reports shall be submitted by January 30 of each year and cover the previous calendar year.
2. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the 12-month VOC emissions limitations listed in Section A.1 and the usage limitation in Section A.2.b. If no deviations occurred during the reporting period, the permittee shall state so in the report.
3. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month HAPs emissions limitations in Section A.2.c. If no deviations occurred during the reporting period, the permittee shall state so in the report.
4. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Terms and Conditions of this permit.

#### E. Testing Requirements

1. Compliance with the emission limitations in Sections A.1 and 2 of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

4.0 lbs/day of VOC

Applicable Compliance Method:

The daily VOC emission rate is based on the emission unit's potential to emit. The potential to emit was calculated by: (maximum production rate in pounds per hour) x (the percent by weight VOC content of the paint) x (emission factor of 1.5%).

b. Emission Limitation:

Volatile organic compound (VOC) emissions based upon the solvent input rate equation listed in term A.2.b shall not exceed 39.9 TPY for emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027 combined, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the annual volatile organic compound emissions based upon the solvent input rate equation listed in term A.2.b shall be based upon the record keeping requirements as specified in Section C.1.

c. Emission Limitation:

Volatile organic compounds (VOC) emissions shall not exceed 39.9 TPY for emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027 combined, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the annual volatile organic compound emissions limitations in term A.1 shall be based upon the record keeping requirements as specified in Section C.1.

d. Emissions Limitations:

9.9 TPY for any single HAP and 24.9 TPY for combined HAPs

Applicable Compliance Method:

Compliance with the HAP emission limitations in term A.2.c shall be determined by the record keeping requirements specified in Section C.2.

F. **Miscellaneous Requirements**

1. The following terms and conditions of this permit are federally enforceable: A, B, C.1, C.2, D, and E.

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

Facility ID: 1431480257 Emissions Unit ID: P023 Issuance type: Final State Permit To Operate

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**Part II - Special Terms and Conditions**

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.

A. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P023 - 50 gallon pebble mill 112	OAC rule 3745-31-05(A)(3) (PTI 14-05553)	Volatile organic compound (VOC) emissions from the mill shall not exceed 9.0 pounds per day.  See Section A.2.a.
	OAC rule 3745-31-05(C)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C). Volatile organic compound (VOC) emissions shall not exceed 39.9 TPY for emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027 combined, based upon a rolling, 12-month summation.  See Sections A.2.b and A.2.c.

2. **Additional Terms and Conditions**

- (a) Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emissions limitations.  
Paint production shall not result in an exceedance of the following emission limitations and /or control requirements:

The permittee shall not use, by weight of VOC emitted more than 39.9 tons of VOC per rolling, 12-month period based upon the monthly solvent input rates as depicted in the following equation, to emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027 combined.

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

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

The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027 shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

The daily VOC emissions limitation outlined is based upon the emissions unit's Potential To Emit (PTE). Therefore, no records are required to demonstrate compliance with this limit.

B. **Operational Restrictions**

1. None

C. **Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information each month for emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027:
- The name and identification of each batch of paint produced.
  - The amount of each paint produced, in pounds.
  - The percent by weight of VOC of each paint mixed/milled.
  - The total combined monthly amount of VOC emissions(emitted) based upon the solvent input rate equation listed in term A.2.b, in tons per month.
  - The updated rolling, 12-month summation of VOC emissions based upon the solvent input rate equation listed in term A.2.b (the summation of the amount of the current month's emission total and the previous eleven calendar months emission totals).
  - The total combined monthly VOC emissions, in tons per month.
  - The updated rolling, 12-month summation of VOC emissions (the summation of the current month's emission total and the previous eleven calendar months emission totals).
2. The permittee shall collect and record the following information each month for emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027:
- The name and identification number of each batch of paint produced containing a HAP(s).
  - The number of pounds of each batch of paint produced.
  - The individual Hazardous Air Pollutant (HAP) content for each HAP per pound of paint produced in pounds of individual HAP per pound of paint.
  - The total combined HAP content of each paint in pounds of combined HAPs per pound of paint [sum all the individual HAP contents from (c)].
  - The total individual HAP emissions for each HAP from all paints employed in pounds or tons per month [for each individual HAP, the summation of (b) x 1.5 percent x (c)].
  - The total combined HAP emissions from all paints employed in pounds or tons per month [the summation of (b) x 1.5 percent x (d)].
  - The updated rolling, 12-month summation for individual HAP emissions for each HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
  - The updated rolling, 12-month summation for total combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
- A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.
3. The permit to install for this emissions unit (P023) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: toluene

TLV (ug/m3): 188,400

Maximum Hourly Emission Rate (lbs/hr): 59.89

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 4318

MAGLC (ug/m3): 4486

Physical changes to or in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

a. Changes in the composition of the materials used, or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

a. A description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. When the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

**D. Reporting Requirements**

1. The permittee shall submit annual reports which specify the total organic compound emissions from emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027. These reports shall be submitted by January 30 of each year and cover the previous calendar year.
2. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the 12-month VOC emissions limitations listed in Section A.1 and the usage limitation in Section A.2.b. If no deviations occurred during the reporting period, the permittee shall state so in the report.
3. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month HAPs emissions limitations in Section A.2.c. If no deviations occurred during the reporting period, the permittee shall state so in the report.
4. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Terms and Conditions of this permit.

**E. Testing Requirements**

1. Compliance with the emission limitations in Sections A.1 and 2 of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:  
9.0 lbs/day of VOC

Applicable Compliance Method:

The daily VOC emission rate is based on the emission unit's potential to emit. The potential to emit was calculated by: (maximum production rate in pounds per hour) x (the percent by weight VOC content of the paint) x (emission factor of 1.5%).

b. Emission Limitation:

Volatile organic compound (VOC) emissions based upon the solvent input rate equation listed in term A.2.b shall not exceed 39.9 TPY for emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027 combined, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the annual volatile organic compound emissions based upon the solvent input rate equation listed in term A.2.b shall be based upon the record keeping requirements as specified in Section C.1.

c. Emission Limitation:

Volatile organic compounds (VOC) emissions shall not exceed 39.9 TPY for emissions units P001 - P005,

P007, P011 - P013, P016 - P017, P021 - P024 and P027 combined, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the annual volatile organic compound emissions limitations in term A.1 shall be based upon the record keeping requirements as specified in Section C.1.

d. Emissions Limitations:

9.9 TPY for any single HAP and 24.9 TPY for combined HAPs

Applicable Compliance Method:

Compliance with the HAP emission limitations in term A.2.c shall be determined by the record keeping requirements specified in Section C.2.

**F. Miscellaneous Requirements**

1. The following terms and conditions of this permit are federally enforceable: A, B, C.1, C.2, D, and E.

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

**Facility ID: 1431480257 Emissions Unit ID: P024 Issuance type: Final State Permit To Operate**

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**Part II - Special Terms and Conditions**

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.

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P024 - 500 gallon pebble mill 149	OAC rule 3745-31-05(A)(3) (PTI 14-05553)	Volatile organic compound (VOC) emissions from the mill shall not exceed 88.8 pounds per day.  See Section A.2.a.
	OAC rule 3745-31-05(C)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C). Volatile organic compound (VOC) emissions shall not exceed 39.9 TPY for emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027 combined, based upon a rolling, 12-month summation.

See Sections A.2.b and A.2.c.

**2. Additional Terms and Conditions**

- (a) Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emissions limitations.  
Paint production shall not result in an exceedance of the following emission limitations and /or control requirements:

The permittee shall not use, by weight of VOC emitted more than 39.9 tons of VOC per rolling, 12-month period based upon the monthly solvent input rates as depicted in the following equation, to emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027 combined.

Monthly solvent input rate = (A x B x C)/2000 where A = the number of pounds of each paint mixed/milled per month, B = the percent by weight of solvent of each paint mixed/milled, and C = 0.015 (emission factor for amount of VOC emitted in lbs of VOC per lb of solvent in the paint).

The permittee has existing records to demonstrate compliance upon issuance of the permit. The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027 shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs.

Compliance with the above limitations shall be based on a rolling, 12-month summation.

The daily VOC emissions limitation outlined is based upon the emissions unit's Potential To Emit (PTE). Therefore, no records are required to demonstrate compliance with this limit.

**B. Operational Restrictions**

1. None

**C. Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information each month for emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027:

- a. The name and identification of each batch of paint produced.
- b. The amount of each paint produced, in pounds.
- c. The percent by weight of VOC of each paint mixed/milled.
- d. The total combined monthly amount of VOC emissions (emitted) based upon the solvent input rate equation listed in term A.2.b, in tons per month.
- e. The updated rolling, 12-month summation of VOC emissions based upon the solvent input rate equation listed in term A.2.b (the summation of the amount of the current month's emission total and the previous eleven calendar months emission totals).
- f. The total combined monthly VOC emissions, in tons per month.
- g. The updated rolling, 12-month summation of VOC emissions (the summation of the current month's emission total and the previous eleven calendar months emission totals).

2. The permittee shall collect and record the following information each month for emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027:

- a. The name and identification number of each batch of paint produced containing a HAP(s).
- b. The number of pounds of each batch of paint produced.
- c. The individual Hazardous Air Pollutant (HAP) content for each HAP per pound of paint produced in pounds of individual HAP per pound of paint.
- d. The total combined HAP content of each paint in pounds of combined HAPs per pound of paint [sum all the individual HAP contents from (c)].
- e. The total individual HAP emissions for each HAP from all paints employed in pounds or tons per month [for each individual HAP, the summation of (b) x 1.5 percent x (c)].
- f. The total combined HAP emissions from all paints employed in pounds or tons per month [the summation of (b) x 1.5 percent x (d)].
- g. The updated rolling, 12-month summation for individual HAP emissions for each HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
- h. The updated rolling, 12-month summation for total combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.

3. The permit to install for this emissions unit (P024) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: toluene

TLV (ug/m3): 188,400

Maximum Hourly Emission Rate (lbs/hr): 59.89

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 4318

MAGLC (ug/m3): 4486

Physical changes to or in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

- a. Changes in the composition of the materials used, or the use of new materials, that would result in the

emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

a. A description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. When the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

#### D. Reporting Requirements

1. The permittee shall submit annual reports which specify the total organic compound emissions from emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027. These reports shall be submitted by January 30 of each year and cover the previous calendar year.
2. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the 12-month VOC emissions limitations listed in Section A.1 and the usage limitation in Section A.2.b. If no deviations occurred during the reporting period, the permittee shall state so in the report.
3. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month HAPs emissions limitations in Section A.2.c. If no deviations occurred during the reporting period, the permittee shall state so in the report.
4. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Terms and Conditions of this permit.

#### E. Testing Requirements

1. Compliance with the emission limitations in Sections A.1 and 2 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:  
88.8 lbs/day of VOC  
  
Applicable Compliance Method:  
The daily VOC emission rate is based on the emission unit's potential to emit. The potential to emit was calculated by: (maximum production rate in pounds per hour) x (the percent by weight VOC content of the paint) x (emission factor of 1.5%).
  - b. Emission Limitation:  
Volatile organic compounds (VOC) emissions based upon the solvent input rate equation listed in term A.2.b shall not exceed 39.9 TPY for emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027 combined, based upon a rolling, 12-month summation.  
  
Applicable Compliance Method:  
Compliance with the annual volatile organic compound emissions based upon the solvent input rate equation listed in term A.2.b shall be based upon the record keeping requirements as specified in Section C.1.
  - c. Emission Limitation:  
Volatile organic compound (VOC) emissions shall not exceed 39.9 TPY for emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027 combined, based upon a rolling, 12-month summation.  
  
Applicable Compliance Method:  
Compliance with the annual volatile organic compound emissions limitations in term A.1 shall be based upon the record keeping requirements as specified in Section C.1.
  - d. Emissions Limitations:  
9.9 TPY for any single HAP and 24.9 TPY for combined HAPs  
  
Applicable Compliance Method:  
Compliance with the HAP emission limitations in term A.2.c shall be determined by the record keeping requirements specified in Section C.2.

#### F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A, B, C.1, C.2, D, and E.

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

Facility ID: 1431480257 Emissions Unit ID: P027 Issuance type: Final State Permit To Operate

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**Part II - Special Terms and Conditions**

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.

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P027 - High Speed Dispersion Mixer 132	OAC rule 3745-31-05(A)(3) (PTI 14-0553)	Volatile organic compound (VOC) emissions from the mixer shall not exceed 147.5 pounds per day.  Particulate emissions (PE) from the mixer shall not exceed 18.5 pounds per day and 3.37 tons per year (TPY).  PE = PM10  See Section A.2.a.
	OAC rule 3745-31-05(C)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1), OAC rule 3745-17-07(B)(1), OAC rule 3745-17-08(B) and OAC rule 3745-31-05(C).  Volatile organic compound (VOC) emissions shall not exceed 39.9 TPY for emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027 combined, based upon a rolling, 12-month summation.
	OAC rule 3745-17-07(A)(1)	See Sections A.2.b and A.2.c.
	OAC rule 3745-17-07(B)(1)	See Section A.2.d.
	OAC rule 3745-17-08(B)	See Section A.2.e.  The permittee shall minimize or eliminate visible particulate emissions by the use of a cover and dust collector.
	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the requirements of OAC rule 3745-31-05(A)(3).

**2. Additional Terms and Conditions**

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

The permittee shall not use, by weight of VOC emitted more than 39.9 tons of VOC per rolling, 12-month period based upon the monthly solvent input rate as depicted in the following equation to emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027 combined.

Monthly solvent input rate = (A x B x C)/2000 where A = the number of pounds of each paint mixed per month, B = the percent by weight of solvent of each paint mixed, and C = 0.015 (emission factor for amount of VOC emitted in lbs of VOC per lbs of solvent in the paint).

The permittee has existing records to demonstrate compliance upon issuance of the permit. The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024

and P027 shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation. Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule. Fugitive visible particulate emissions shall not exceed 20 percent opacity, as a three-minute average. The daily VOC and the daily and annual PE-PM10 emissions limitations outlined are based upon the emissions unit's Potential To Emit (PTE). Therefore, no records are required to demonstrate compliance with these limits.

**B. Operational Restrictions**

1. None

**C. Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information each month for emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027:
- The name and identification of each batch of paint produced.
  - The amount of each paint produced, in pounds.
  - The percent by weight of VOC of each paint mixed.
  - The total combined monthly amount of VOC emissions (emitted) based upon the solvent input rate equation listed in term A.2.b, in tons per month.
  - The updated rolling, 12-month summation of VOC emissions based upon the solvent input rate equation listed in term A.2.b (the summation of the amount of the current month's emission total and the previous eleven calendar months emission totals).
  - The total combined monthly VOC emissions, in tons per month.
  - The updated rolling, 12-month summation of VOC emissions (the summation of the current month's emission total and the previous eleven calendar months emission totals).
2. The permittee shall collect and record the following information each month for determining the particulate matter emissions:
- The name and identification of each batch of paint produced.
  - The total amount of solids used in the formulation of paints, in pounds.
  - The total monthly PM emissions, in tons per month.
3. The permittee shall collect and record the following information each month for emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027:
- The name and identification number of each batch of paint produced containing a HAP(s).
  - The number of pounds of each batch of paint produced.
  - The individual Hazardous Air Pollutant (HAP) content for each HAP per pound of paint produced in pounds of individual HAP per pound of paint.
  - The total combined HAP content of each paint in pounds of combined HAPs per pound of paint [sum all the individual HAP contents from (c)].
  - The total individual HAP emissions for each HAP from all paints employed in pounds or tons per month [for each individual HAP, the summation of (b) x 1.5 percent x (c)].
  - The total combined HAP emissions from all paints employed in pounds or tons per month [the summation of (b) x 1.5 percent x (d)].
  - The updated rolling, 12-month summation for individual HAP emissions for each HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
  - The updated rolling, 12-month summation for total combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
- A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.
4. The permit to install for this emissions unit (P027) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: toluene

TLV (ug/m3): 188,400

Maximum Hourly Emission Rate (lbs/hr): 59.89

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 4318

MAGLC (ug/m3): 4486

Physical changes to or in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

a. Changes in the composition of the materials used, or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

a. A description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. When the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

**D. Reporting Requirements**

1. The permittee shall submit annual reports which specify the total organic compound emissions from emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027. These reports shall be submitted by January 30 of each year and cover the previous calendar year.
2. The permittee shall submit annual reports which specify the particulate matter emissions from this emissions units. These reports shall be submitted by January 30 of each year and cover the previous calendar year.
3. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the 12-month VOC emissions limitations listed in Section A.1 and the usage limitation in Section A.2.b. If no deviations occurred during the reporting period, the permittee shall state so in the report.
4. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month HAPs emissions limitations in Section A.2.c. If no deviations occurred during the reporting period, the permittee shall state so in the report.
5. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Terms and Conditions of this permit.

**E. Testing Requirements**

1. Compliance with the emission limitations in Sections A.1 and 2 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:  
147.5 lbs/day of VOC  
  
Applicable Compliance Method:  
The daily VOC emission rate is based on the emission unit's potential to emit. The potential to emit was calculated by: (maximum production rate in pounds per hour) x (the percent by weight VOC) x (emission factor of 1.5%).
  - b. Emission Limitation:  
18.5 lbs/day of PE-PM10.  
  
Applicable Compliance Method:  
The daily PE-PM10 emission rate is based on the emissions unit's potential to emit. The potential to emit was calculated by: (maximum production rate in pounds per hour) x (the percent by weight PM) x (emission factor of 1.0%).
  - c. Emission Limitation:  
Volatile organic compound (VOC) emissions based upon the solvent input rate equation listed in term A.2.b shall not exceed 39.9 TPY for emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027 combined, based upon a rolling, 12-month summation.

**Applicable Compliance Method:**

Compliance with the annual volatile organic compound emissions limitation based upon the solvent input rate equation listed in term A.2.b shall be based upon the record keeping requirements as specified in Section C.1.

**d. Emission Limitation:**

Volatile organic compound (VOC) emissions shall not exceed 39.9 TPY for emissions units P001 - P005, P007, P011 - P013, P016 - P017, P021 - P024 and P027 combined, based upon a rolling, 12-month summation

**Applicable Compliance Method:**

Compliance with the annual volatile organic compound emission limitations in term A.1 shall be based upon the record keeping requirements as specified in Section C.1.

**e. Emission Limitation:**

3.37 TPY of PE-PM10.

**Applicable Compliance Limitation:**

Compliance with the annual particulate emission limitations in term A.1 shall be based upon the record keeping requirements as specified in Section C.2.

**f. Emissions Limitations:**

9.9 TPY for any single HAP and 24.9 TPY for combined HAPs.

**Applicable Compliance Method:**

Compliance with the HAP emission limitations in term A.2.c will be determined by the record keeping requirements specified in Section C.3.

**g. Emissions Limitations:**

Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule.

Fugitive visible particulate emissions shall not exceed twenty percent (20%) opacity, as a three-minute average.

**Applicable Compliance Method**

Compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

**F. Miscellaneous Requirements**

1. The following terms and conditions of this permit are federally enforceable: A., B., C.1 - C.3, D. and E.