

Facility ID: 1652050077 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.

- [Go to Part II for Emissions Unit P005](#)
- [Go to Part II for Emissions Unit P006](#)
- [Go to Part II for Emissions Unit P007](#)
- [Go to Part II for Emissions Unit P008](#)
- [Go to Part II for Emissions Unit P009](#)
- [Go to Part II for Emissions Unit P011](#)
- [Go to Part II for Emissions Unit P012](#)
- [Go to Part II for Emissions Unit P013](#)
- [Go to Part II for Emissions Unit P014](#)
- [Go to Part II for Emissions Unit P015](#)
- [Go to Part II for Emissions Unit P016](#)
- [Go to Part II for Emissions Unit P017](#)
- [Go to Part II for Emissions Unit Z015](#)

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

Facility ID: 1652050077 Emissions Unit ID: P005 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

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>
OB #1, 916-gallon mix vat - oil based paint and primer process	OAC rule 3745-31-05 (PTI 16-1879)	8.0 lbs/hr of organic compounds (OC) 40.0 lbs/day of OC 7.3 tpy of OC
		5% opacity as a 6-minute average (stack emissions)
		2.34 lbs/hr of particulate emissions (PE) 10.25 tpy of PE
		See A.2.a below.
		See A.2.a below.
	OAC rule 3745-17-07	See A.2.a below.
	OAC rule 3745-17-11	See A.2.a below.
	OAC rule 3745-21-07(G)(2)	See A.2.b through A.2.d below.
	OAC rule 3745-35-07	

2. Additional Terms and Conditions

- (a) The emissions limitation based on this applicable rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05. Combined annual emissions from this facility shall not exceed the following limitations, as rolling, 12-month summations:
 - 87.88 tons of volatile organic compounds (VOC);
 - 24.11 tons of combined hazardous air pollutants (HAP); and
 - 9.50 tons of each individual HAP.
 To ensure enforceability during the first 12 calendar months of operation following the issuance of this

permit, the permittee shall not exceed the emission levels specified in the following table:

Month(s)	Facility VOC Limit	Facility Total HAP Limit	Facility Individual HAP Limit
----------	--------------------	--------------------------	-------------------------------

1	29.29 tons	8.04 tons	3.17 tons
1-2	29.29 tons	8.04 tons	3.17 tons
1-3	29.29 tons	8.04 tons	3.17 tons
1-4	29.29 tons	8.04 tons	3.17 tons
1-5	58.58 tons	16.08 tons	6.34 tons
1-6	58.58 tons	16.08 tons	6.34 tons
1-7	58.58 tons	16.08 tons	6.34 tons
1-8	58.58 tons	16.08 tons	6.34 tons
1-9	87.88 tons	24.11 tons	9.50 tons
1-10	87.88 tons	24.11 tons	9.50 tons
1-11	87.88 tons	24.11 tons	9.50 tons
1-12	87.88 tons	24.11 tons	9.50 tons

After the first 12 calendar months of operation following the issuance of this permit, compliance with the facility-wide VOC and HAP emission limitations shall be based upon a rolling, 12-month summation of the combined annual emissions, in tons.

The permittee shall include all OC in the calculation of VOC emissions. The permittee has requested this condition in order to streamline the record keeping requirements.

B. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 4 to 7 inches of water while the emissions unit is in operation.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.
2. The permittee shall collect and record the following information for each and every day of production:
 - a. the production date and identification number of each batch produced;
 - b. the batch size, in gallons;
 - c. the batch density, in pounds per gallon;
 - d. the VOC, individual HAP, and combined HAPs contents of each batch, in weight percent;
 - e. the daily cycle time for the emissions unit, in hours;
 - f. the daily VOC, individual HAP, and combined HAPs emission rates, in pounds per day, i.e., the summation of the emissions from each batch produced that day; and
 - g. the calculated average hourly VOC emission rate for the daily production, in pounds of VOC per hour (average).

VOC, individual HAP, and combined HAPs emissions shall be calculated based upon the methodology specified in sections E.1.a, E.1.d, E.1.e and E.1.f below.

3. For each month, the permittee shall collect and record the following information for each emissions unit at this facility:
 - a. the monthly VOC emissions, in tons;
 - b. the monthly emissions of each individual HAP, in tons; and
 - c. the monthly combined HAPs emissions, in tons.
4. The permittee shall, on a monthly basis, calculate and record the rolling 12-month, VOC, individual HAP, and combined HAPs emission rates for all emissions units at the facility, in tons.

D. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports identify that all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. an identification of each day during which the average hourly OC emissions from the daily production exceeded 8 lbs/hr, and the actual average hourly OC emissions for the daily production; and
 - b. an identification of each day during which the OC emissions exceeded 40 lbs/day, and the actual OC emissions for each such day.
3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for VOC and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.
4. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for each individual HAP and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.
5. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for total combined HAPs and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.

6. The quarterly deviation reports shall be submitted in accordance with the requirements specified in Part I-General Terms and Condition 3 of this permit.
7. The permittee shall submit annual reports that specify the total VOC, individual HAP, and combined HAPs emissions from the entire facility, in tons. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

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

Emission Limitations:

8.0 lbs/hr of OC
40.0 lbs/day of OC
7.3 tpy of OC

Applicable Compliance Methods:

The permittee shall demonstrate compliance with the above limits based upon the record keeping requirements of section C.2 and C.3.

Formulation data or USEPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the OC contents of the cleanup materials, coatings and inks.

Daily and hourly VOC emissions shall be calculated in accordance with the following equations:

Daily VOC Emissions = [SUMMATION of (Size * Density * Weight Fraction * EF * (1 - CF))] for all batches produced during the day]

Where:

Daily VOC Emissions = VOC emission rate for the day's production, in pounds per day;

Size = batch size, in gallons;

Density = batch density, in pounds per gallon;

Weight Fraction = VOC content of each batch, as a weight fraction;

EF = solvent loss emission factor (AP-42, Section 6.4), 0.015; and

CF = control factor (from Control of VOC Emissions from Ink and Paint Manufacturing Processes, USEPA-450/3-92-013, Section 4.2.1.1) of 0.40, based on the use of a cover for the tank.

Hourly VOC emissions = Daily VOC Emissions / Time

Where:

Time = total daily production time, in hours.

Emission Limitation:

5% opacity as a 6-minute average
(stack emissions)

Applicable Compliance Method:

OAC rule 3745-17-03(B)(1)

Emission Limitation:

2.34 lb/hr of PE
10.25 tpy of PE

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the hourly emission limitation by testing in accordance with USEPA Methods 1 - 5, 40 CFR Part 60, Appendix A.

The annual emission limitation was developed by multiplying the hourly mass emission limitation by 8760 hours per year and dividing by 2000 to convert to tons. Therefore, compliance with the annual limitation will be ensured if compliance with the hourly limitation is maintained.

Emission Limitation:

87.88 tpy of VOC for entire facility, as a rolling 12-month summation

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of sections C.2 - C.4.

The monthly and rolling, 12-month VOC emissions from this emissions unit shall be calculated by summing the daily emission rates from section C.2. [All OC emissions are included in the calculation of VOC emissions.] The calculated, rolling, 12-month VOC emissions from this emissions unit shall be added to the calculated, rolling, 12-month VOC emissions from all the other emissions units at the facility to obtain the rolling, 12-month VOC emissions for the entire facility.

Emission Limitation:

9.50 tpy of any individual HAP for entire facility, as a rolling 12-month summation

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of sections C.2 - C.4.

Individual HAP emissions from this emissions unit shall be calculated in accordance with the following equation:

Individual HAP Emissions = [SUMMATION of (Size * Weight Fraction of Individual HAP * EF * (1 - CF)) for all batches produced during the day]

Where:

Individual HAP Emissions = Individual HAP emission rate for the day's production, in pounds per day;

Size = batch size, in gallons;

Density = batch density, in pounds per gallon;

Weight Fraction of Individual HAP = Individual HAP content of each batch, as a weight fraction;

EF = solvent loss emission factor (AP-42, Section 6.4), 0.015; and

CF = control factor (from Control of VOC Emissions from Ink and Paint Manufacturing Processes, USEPA-450/3-92-013, Section 4.2.1.1) of 0.40, based on the use of a cover for the tank.

The monthly and rolling, 12-month individual HAP emissions from this emissions unit shall be calculated by summing the daily emission rates from section C.2. The calculated, rolling, 12-month individual HAP emissions from this emissions unit shall be added to the calculated, rolling, 12-month individual HAP emissions from all the other emissions units at the facility to obtain the rolling, 12-month individual HAP emissions for the entire facility.

Emission Limitation:

24.11 tpy of all HAPs for entire facility, as a rolling 12-month summation

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of sections C.2 - C.4 of these T&C's.

Combined HAPs emissions from this emissions unit shall be calculated in accordance with the following equation:

Combined HAPs Emissions = [SUMMATION of (Size * Weight Fraction of Combined HAPs * EF * (1 - CF)) for all batches produced during the day]

Where:

Combined HAPs Emissions = Combined HAPs emission rate, as a 12-month rolling summation;

Size = batch size, in gallons;

Density = batch density, in pounds per gallon;

Weight Fraction of Combined HAPs = Combined HAPs content of each batch, as a weight fraction;

EF = solvent loss emission factor (AP-42, Section 6.4), 0.015; and

CF = control factor (from Control of VOC Emissions from Ink and Paint Manufacturing Processes, USEPA-450/3-92-013, Section 4.2.1.1) of 0.40, based on the use of a cover for the tank.

The monthly and rolling, 12-month combined HAPs emissions from this emissions unit shall be calculated by summing the daily emission rates from section C.2. The calculated, rolling, 12-month combined HAPs emissions from this emissions unit shall be added to the calculated, rolling, 12-month combined HAPs emissions from all the other emissions units at the facility to obtain the rolling, 12-month combined HAPs emissions for the entire facility.

F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A, B, C, D, E, and F. The applicant has requested that such restrictions be imposed in order to limit the potential to emit for the facility and, therefore, avoid Title V applicability.

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

Facility ID: 1652050077 Emissions Unit ID: P006 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

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>
OB #2, 916-gallon mix vat - oil based paint and primer process	OAC rule 3745-31-05 (PTI 16-1879)	8.0 lbs/hr of organic compounds (OC) 40.0 lbs/day of OC 7.3 tpy of OC
		5% opacity as a 6-minute average (stack emissions)
		2.34 lbs/hr of particulate emissions (PE) 10.25 tpy of PE
		See A.2.a below.
	OAC rule 3745-17-07	See A.2.a below.
	OAC rule 3745-17-11	See A.2.a below.
	OAC rule 3745-21-07(G)(2)	See A.2.b through A.2.d below.
	OAC rule 3745-35-07	

2. Additional Terms and Conditions

- (a) The emissions limitation based on this applicable rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05. Combined annual emissions from this facility shall not exceed the following limitations, as rolling, 12-month summations:

87.88 tons of volatile organic compounds (VOC);
24.11 tons of combined hazardous air pollutants (HAP); and
9.50 tons of each individual HAP.
To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month(s) Facility VOC Limit Facility Total HAP Limit Facility Individual HAP Limit

1	29.29 tons	8.04 tons	3.17 tons
1-2	29.29 tons	8.04 tons	3.17 tons
1-3	29.29 tons	8.04 tons	3.17 tons
1-4	29.29 tons	8.04 tons	3.17 tons
1-5	58.58 tons	16.08 tons	6.34 tons
1-6	58.58 tons	16.08 tons	6.34 tons
1-7	58.58 tons	16.08 tons	6.34 tons
1-8	58.58 tons	16.08 tons	6.34 tons
1-9	87.88 tons	24.11 tons	9.50 tons
1-10	87.88 tons	24.11 tons	9.50 tons
1-11	87.88 tons	24.11 tons	9.50 tons
1-12	87.88 tons	24.11 tons	9.50 tons

After the first 12 calendar months of operation following the issuance of this permit, compliance with the facility-wide VOC and HAP emission limitations shall be based upon a rolling, 12-month summation of the combined annual emissions, in tons.
The permittee shall include all OC in the calculation of VOC emissions. The permittee has requested this condition in order to streamline the record keeping requirements.

B. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 4 to 7 inches of water while the emissions unit is in operation.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.

2. The permittee shall collect and record the following information for each and every day of production:
 - a. the production date and identification number of each batch produced;
 - b. the batch size, in gallons;
 - c. the batch density, in pounds per gallon;
 - d. the VOC, individual HAP, and combined HAPs contents of each batch, in weight percent;
 - e. the daily cycle time for the emissions unit, in hours;
 - f. the daily VOC, individual HAP, and combined HAPs emission rates, in pounds per day, i.e., the summation of the emissions from each batch produced that day; and
 - g. the calculated average hourly VOC emission rate for the daily production, in pounds of VOC per hour (average).

VOC, individual HAP, and combined HAPs emissions shall be calculated based upon the methodology specified in sections E.1.a, E.1.d, E.1.e and E.1.f below.
3. For each month, the permittee shall collect and record the following information for each emissions unit at this facility:
 - a. the monthly VOC emissions, in tons;
 - b. the monthly emissions of each individual HAP, in tons; and
 - c. the monthly combined HAPs emissions, in tons.
4. The permittee shall, on a monthly basis, calculate and record the rolling 12-month, VOC, individual HAP, and combined HAPs emission rates for all emissions units at the facility, in tons.

D. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports identify that all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. an identification of each day during which the average hourly OC emissions from the daily production exceeded 8 lbs/hr, and the actual average hourly OC emissions for the daily production; and
 - b. an identification of each day during which the OC emissions exceeded 40 lbs/day, and the actual OC emissions for each such day.
3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for VOC and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.
4. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for each individual HAP and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.
5. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for total combined HAPs and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.
6. The quarterly deviation reports shall be submitted in accordance with the requirements specified in Part I-General Terms and Condition 3 of this permit.
7. The permittee shall submit annual reports that specify the total VOC, individual HAP, and combined HAPs emissions from the entire facility, in tons. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

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

Emission Limitations:

8.0 lbs/hr of OC
40.0 lbs/day of OC
7.3 tpy of OC

Applicable Compliance Methods:

The permittee shall demonstrate compliance with the above limits based upon the record keeping requirements of section C.2 and C.3.

Formulation data or USEPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the OC contents of the cleanup materials, coatings and inks.

Daily and hourly VOC emissions shall be calculated in accordance with the following equations:

Daily VOC Emissions = [SUMMATION of (Size * Density * Weight Fraction * EF * (1 - CF))] for all batches produced during the day]

Where:

Daily VOC Emissions = VOC emission rate for the day's production, in pounds per day;

Size = batch size, in gallons;

Density = batch density, in pounds per gallon;

Weight Fraction = VOC content of each batch, as a weight fraction;

EF = solvent loss emission factor (AP-42, Section 6.4), 0.015; and

CF = control factor (from Control of VOC Emissions from Ink and Paint Manufacturing Processes, USEPA-450/3-92-013, Section 4.2.1.1) of 0.40, based on the use of a cover for the tank.

Hourly VOC emissions = Daily VOC Emissions / Time

Where:

Time = total daily production time, in hours.

Emission Limitation:

5% opacity as a 6-minute average
(stack emissions)

Applicable Compliance Method:

OAC rule 3745-17-03(B)(1)

Emission Limitation:

2.34 lb/hr of PE
10.25 tpy of PE

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the hourly emission limitation by testing in accordance with USEPA Methods 1 - 5, 40 CFR Part 60, Appendix A.

The annual emission limitation was developed by multiplying the hourly mass emission limitation by 8760 hours per year and dividing by 2000 to convert to tons. Therefore, compliance with the annual limitation will be ensured if compliance with the hourly limitation is maintained.

Emission Limitation:

87.88 tpy of VOC for entire facility, as a rolling 12-month summation

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of sections C.2 - C.4.

The monthly and rolling, 12-month VOC emissions from this emissions unit shall be calculated by summing the daily emission rates from section C.2. [All OC emissions are included in the calculation of VOC emissions.] The calculated, rolling, 12-month VOC emissions from this emissions unit shall be added to the calculated, rolling, 12-month VOC emissions from all the other emissions units at the facility to obtain the rolling, 12-month VOC emissions for the entire facility.

Emission Limitation:

9.50 tpy of any individual HAP for entire facility, as a rolling 12-month summation

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of sections C.2 - C.4.

Individual HAP emissions from this emissions unit shall be calculated in accordance with the following equation:

Individual HAP Emissions = [SUMMATION of (Size * Weight Fraction of Individual HAP * EF * (1 - CF)) for all batches produced during the day]

Where:

Individual HAP Emissions = Individual HAP emission rate for the day's production, in pounds per day;

Size = batch size, in gallons;

Density = batch density, in pounds per gallon;

Weight Fraction of Individual HAP = Individual HAP content of each batch, as a weight fraction;

EF = solvent loss emission factor (AP-42, Section 6.4), 0.015; and

CF = control factor (from Control of VOC Emissions from Ink and Paint Manufacturing Processes, USEPA-450/3-92-013, Section 4.2.1.1) of 0.40, based on the use of a cover for the tank.

The monthly and rolling, 12-month individual HAP emissions from this emissions unit shall be calculated by summing the daily emission rates from section C.2. The calculated, rolling, 12-month individual HAP emissions from this emissions unit shall be added to the calculated, rolling, 12-month individual HAP emissions from all

the other emissions units at the facility to obtain the rolling, 12-month individual HAP emissions for the entire facility.
Emission Limitation:

24.11 tpy of all HAPs for entire facility, as a rolling 12-month summation

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of sections C.2 - C.4 of these T&C's.

Combined HAPs emissions from this emissions unit shall be calculated in accordance with the following equation:

Combined HAPs Emissions = [SUMMATION of (Size * Weight Fraction of Combined HAPs * EF * (1 - CF)) for all batches produced during the day]

Where:

Combined HAPs Emissions = Combined HAPs emission rate, as a 12-month rolling summation;

Size = batch size, in gallons;

Density = batch density, in pounds per gallon;

Weight Fraction of Combined HAPs = Combined HAPs content of each batch, as a weight fraction;

EF = solvent loss emission factor (AP-42, Section 6.4), 0.015; and

CF = control factor (from Control of VOC Emissions from Ink and Paint Manufacturing Processes, USEPA-450/3-92-013, Section 4.2.1.1) of 0.40, based on the use of a cover for the tank.

The monthly and rolling, 12-month combined HAPs emissions from this emissions unit shall be calculated by summing the daily emission rates from section C.2. The calculated, rolling, 12-month combined HAPs emissions from this emissions unit shall be added to the calculated, rolling, 12-month combined HAPs emissions from all the other emissions units at the facility to obtain the rolling, 12-month combined HAPs emissions for the entire facility.

F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A, B, C, D, E, and F. The applicant has requested that such restrictions be imposed in order to limit the potential to emit for the facility and, therefore, avoid Title V applicability.

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

Facility ID: 1652050077 Emissions Unit ID: P007 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

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>
OB #3 mix vat - oil based paint and primer process	OAC rule 3745-31-05 (PTI 16-1879)	8.0 lbs/hr of organic compounds (OC) 40.0 lbs/day of OC 7.3 tpy of OC 5% opacity as a 6-minute average (stack emissions) 2.34 lbs/hr of particulate emissions (PE) 10.25 tpy of PE

See A.2.a below.

See A.2.a below.

OAC rule 3745-17-07

See A.2.a below.

OAC rule 3745-17-11

See A.2.b through A.2.d below.

OAC rule 3745-21-07(G)(2)

OAC rule 3745-35-07

2. Additional Terms and Conditions

- (a) The emissions limitation based on this applicable rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05. Combined annual emissions from this facility shall not exceed the following limitations, as rolling, 12-month summations:

87.88 tons of volatile organic compounds (VOC);
 24.11 tons of combined hazardous air pollutants (HAP); and
 9.50 tons of each individual HAP.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month(s) Facility VOC Limit Facility Total HAP Limit Facility Individual HAP Limit

1	29.29 tons	8.04 tons	3.17 tons
1-2	29.29 tons	8.04 tons	3.17 tons
1-3	29.29 tons	8.04 tons	3.17 tons
1-4	29.29 tons	8.04 tons	3.17 tons
1-5	58.58 tons	16.08 tons	6.34 tons
1-6	58.58 tons	16.08 tons	6.34 tons
1-7	58.58 tons	16.08 tons	6.34 tons
1-8	58.58 tons	16.08 tons	6.34 tons
1-9	87.88 tons	24.11 tons	9.50 tons
1-10	87.88 tons	24.11 tons	9.50 tons
1-11	87.88 tons	24.11 tons	9.50 tons
1-12	87.88 tons	24.11 tons	9.50 tons

After the first 12 calendar months of operation following the issuance of this permit, compliance with the facility-wide VOC and HAP emission limitations shall be based upon a rolling, 12-month summation of the combined annual emissions, in tons.

The permittee shall include all OC in the calculation of VOC emissions. The permittee has requested this condition in order to streamline the record keeping requirements.

B. Operational Restrictions

- 1. The pressure drop across the baghouse shall be maintained within the range of 4 to 7 inches of water while the emissions unit is in operation.

C. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.
- 2. The permittee shall collect and record the following information for each and every day of production:
 - a. the production date and identification number of each batch produced;
 - b. the batch size, in gallons;
 - c. the batch density, in pounds per gallon;
 - d. the VOC, individual HAP, and combined HAPs contents of each batch, in weight percent;
 - e. the daily cycle time for the emissions unit, in hours;
 - f. the daily VOC, individual HAP, and combined HAPs emission rates, in pounds per day, i.e., the summation of the emissions from each batch produced that day; and
 - g. the calculated average hourly VOC emission rate for the daily production, in pounds of VOC per hour (average).

VOC, individual HAP, and combined HAPs emissions shall be calculated based upon the methodology specified in sections E.1.a, E.1.d, E.1.e and E.1.f below.
- 3. For each month, the permittee shall collect and record the following information for each emissions unit at this facility:
 - a. the monthly VOC emissions, in tons;
 - b. the monthly emissions of each individual HAP, in tons; and
 - c. the monthly combined HAPs emissions, in tons.
- 4. The permittee shall, on a monthly basis, calculate and record the rolling 12-month, VOC, individual HAP, and combined HAPs emission rates for all emissions units at the facility, in tons.

D. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports identify that all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. an identification of each day during which the average hourly OC emissions from the daily production exceeded 8 lbs/hr, and the actual average hourly OC emissions for the daily production; and
 - b. an identification of each day during which the OC emissions exceeded 40 lbs/day, and the actual OC emissions for each such day.
3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for VOC and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.
4. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for each individual HAP and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.
5. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for total combined HAPs and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.
6. The quarterly deviation reports shall be submitted in accordance with the requirements specified in Part I-General Terms and Condition 3 of this permit.
7. The permittee shall submit annual reports that specify the total VOC, individual HAP, and combined HAPs emissions from the entire facility, in tons. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

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

8.0 lbs/hr of OC
40.0 lbs/day of OC
7.3 tpy of OC

Applicable Compliance Methods:

The permittee shall demonstrate compliance with the above limits based upon the record keeping requirements of section C.2 and C.3.

Formulation data or USEPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the OC contents of the cleanup materials, coatings and inks.

Daily and hourly VOC emissions shall be calculated in accordance with the following equations:

Daily VOC Emissions = [SUMMATION of (Size * Density * Weight Fraction * EF * (1 - CF)) for all batches produced during the day]

Where:

Daily VOC Emissions = VOC emission rate for the day's production, in pounds per day;

Size = batch size, in gallons;

Density = batch density, in pounds per gallon;

Weight Fraction = VOC content of each batch, as a weight fraction;

EF = solvent loss emission factor (AP-42, Section 6.4), 0.015; and

CF = control factor (from Control of VOC Emissions from Ink and Paint Manufacturing Processes, USEPA-450/3-92-013, Section 4.2.1.1) of 0.40, based on the use of a cover for the tank.

Hourly VOC emissions = Daily VOC Emissions / Time

Where:

Time = total daily production time, in hours.

Emission Limitation:

5% opacity as a 6-minute average
(stack emissions)

Applicable Compliance Method:

OAC rule 3745-17-03(B)(1)

Emission Limitation:

2.34 lb/hr of PE
10.25 tpy of PE

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the hourly emission limitation by testing in accordance with USEPA Methods 1 - 5, 40 CFR Part 60, Appendix A.

The annual emission limitation was developed by multiplying the hourly mass emission limitation by 8760 hours per year and dividing by 2000 to convert to tons. Therefore, compliance with the annual limitation will be ensured if compliance with the hourly limitation is maintained.

Emission Limitation:

87.88 tpy of VOC for entire facility, as a rolling 12-month summation

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of sections C.2 - C.4.

The monthly and rolling, 12-month VOC emissions from this emissions unit shall be calculated by summing the daily emission rates from section C.2. [All OC emissions are included in the calculation of VOC emissions.] The calculated, rolling, 12-month VOC emissions from this emissions unit shall be added to the calculated, rolling, 12-month VOC emissions from all the other emissions units at the facility to obtain the rolling, 12-month VOC emissions for the entire facility.

Emission Limitation:

9.50 tpy of any individual HAP for entire facility, as a rolling 12-month summation

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of sections C.2 - C.4.

Individual HAP emissions from this emissions unit shall be calculated in accordance with the following equation:

Individual HAP Emissions = [SUMMATION of (Size * Weight Fraction of Individual HAP * EF * (1 - CF)) for all batches produced during the day]

Where:

Individual HAP Emissions = Individual HAP emission rate for the day's production, in pounds per day;

Size = batch size, in gallons;

Density = batch density, in pounds per gallon;

Weight Fraction of Individual HAP = Individual HAP content of each batch, as a weight fraction;

EF = solvent loss emission factor (AP-42, Section 6.4), 0.015; and

CF = control factor (from Control of VOC Emissions from Ink and Paint Manufacturing Processes, USEPA-450/3-92-013, Section 4.2.1.1) of 0.40, based on the use of a cover for the tank.

The monthly and rolling, 12-month individual HAP emissions from this emissions unit shall be calculated by summing the daily emission rates from section C.2. The calculated, rolling, 12-month individual HAP emissions from this emissions unit shall be added to the calculated, rolling, 12-month individual HAP emissions from all the other emissions units at the facility to obtain the rolling, 12-month individual HAP emissions for the entire facility.

Emission Limitation:

24.11 tpy of all HAPs for entire facility, as a rolling 12-month summation

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of sections C.2 - C.4 of these T&C's.

Combined HAPs emissions from this emissions unit shall be calculated in accordance with the following equation:

Combined HAPs Emissions = [SUMMATION of (Size * Weight Fraction of Combined HAPs * EF * (1 - CF)) for all batches produced during the day]

Where:

Combined HAPs Emissions = Combined HAPs emission rate, as a 12-month rolling summation;

Size = batch size, in gallons;

Density = batch density, in pounds per gallon;

Weight Fraction of Combined HAPs = Combined HAPs content of each batch, as a weight fraction;

EF = solvent loss emission factor (AP-42, Section 6.4), 0.015; and

CF = control factor (from Control of VOC Emissions from Ink and Paint Manufacturing Processes, USEPA-450/3-92-013, Section 4.2.1.1) of 0.40, based on the use of a cover for the tank.

The monthly and rolling, 12-month combined HAPs emissions from this emissions unit shall be calculated by summing the daily emission rates from section C.2. The calculated, rolling, 12-month combined HAPs emissions from this emissions unit shall be added to the calculated, rolling, 12-month combined HAPs emissions from all the other emissions units at the facility to obtain the rolling, 12-month combined HAPs emissions for the entire facility.

F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A, B, C, D, E, and F. The applicant has requested that such restrictions be imposed in order to limit the potential to emit for the facility and, therefore, avoid Title V applicability.

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

Facility ID: 1652050077 Emissions Unit ID: P008 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

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>
OB fill #1 - packaging of oil based paint	OAC rule 3745-31-05 (PTI 16-1979)	7.71 lbs/hr of organic compounds (OC) 40.0 lbs/day of OC 7.3 tpy of OC
	OAC rule 3745-21-07(G)(2)	See A.2.a below.
	OAC rule 3745-35-07	See A.2.b through A.2.d below.

2. Additional Terms and Conditions

- (a) The emissions limit based on this applicable rule is less stringent than the limit established pursuant to OAC rule 3745-31-05. Combined annual emissions from this facility shall not exceed the following limitations, as rolling, 12-month summations:

87.88 tons of volatile organic compounds (VOC);
24.11 tons of combined hazardous air pollutants (HAP); and
9.50 tons of each individual HAP.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month(s) Facility VOC Limit Facility Total HAP Limit Facility Individual HAP Limit

1	29.29 tons	8.04 tons	3.17 tons
1-2	29.29 tons	8.04 tons	3.17 tons
1-3	29.29 tons	8.04 tons	3.17 tons
1-4	29.29 tons	8.04 tons	3.17 tons
1-5	58.58 tons	16.08 tons	6.34 tons
1-6	58.58 tons	16.08 tons	6.34 tons
1-7	58.58 tons	16.08 tons	6.34 tons
1-8	58.58 tons	16.08 tons	6.34 tons
1-9	87.88 tons	24.11 tons	9.50 tons
1-10	87.88 tons	24.11 tons	9.50 tons
1-11	87.88 tons	24.11 tons	9.50 tons
1-12	87.88 tons	24.11 tons	9.50 tons

After the first 12 calendar months of operation following the issuance of this permit, compliance with the facility-wide VOC and HAP emission limitations shall be based upon rolling, 12-month summations of the monthly emissions, in tons.

The permittee shall include all OC in the calculation of VOC emissions. The permittee has requested this condition in order to streamline the record keeping requirements.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each and every batch filled:
- the filling date and ticket identification number;
 - the number of gallons filled;
 - the paint density, in pounds per gallon;
 - the VOC, individual HAP, and combined HAPs contents of each batch, as a weight fraction;
 - the fill running time, in hours;
 - the calculated VOC, individual HAP, and combined HAPs emission rates for each batch filled, i.e., $(b)*(c)*(d)*(0.005)$, in pounds per day; and
 - the average hourly VOC emission rate, i.e., $(\text{the summation of (f) for all batches filled})/(e)$, in pounds/hour.

A filtration loss factor of 0.005 is used for the transfer of paint.

2. The permittee shall calculate and record the daily VOC, individual HAP, and combined HAPs emission rates for this emissions unit, in lbs/day, i.e., the summation of the VOC, individual HAP, and combined HAPs emissions from all batches filled each day.
3. For each month, the permittee shall collect and record the following information for each emissions unit at this facility:
- the monthly VOC emissions, in tons;
 - the monthly emissions of each individual HAP, in tons; and
 - the monthly combined HAPs emissions, in tons.
4. The permittee shall, on a monthly basis, calculate and record the rolling 12-month, VOC, individual HAP, and combined HAPs emission rates for all emissions units at the facility, in tons.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
- an identification of each day during which the average hourly OC emissions from any batch filled exceeded 7.71 lbs/hr, and the actual average hourly OC emissions for batch filled; and
 - an identification of each day during which the OC emissions exceeded 40 lbs/day, and the actual OC emissions for each such day.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for VOC and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.
3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for each individual HAP and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.
4. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for total combined HAPs and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.
5. The quarterly deviation reports shall be submitted in accordance with the requirements specified in Part I-General Terms and Condition 3 of this permit.
6. The permittee shall submit annual reports that specify the total VOC, individual HAP, and combined HAPs emissions from the entire facility, in tons. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

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

Emission Limitations:
 7.71 lbs/hr of OC
 40.0 lbs/day of OC
 7.3 tpy of OC

Applicable Compliance Methods:

The permittee shall demonstrate compliance with the above limits based upon the record keeping requirements of sections C.1 and C.2.

Formulation data or USEPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the OC contents of the cleanup materials, coatings and inks.
 Emission Limitation:

87.88 tpy of VOC for entire facility, as a rolling 12-month summation

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of sections C.1 - C.4.

The monthly and rolling, 12-month VOC emissions from this emissions unit shall be calculated by summing the daily emission rates from section C.2. [All OC emissions are included in the calculation of VOC emissions.] The calculated, rolling, 12-month VOC emissions from this emissions unit shall be added to the calculated, rolling, 12-month VOC emissions from all the other emissions units at the facility to obtain the rolling, 12-month VOC emissions for the entire facility.

Emission Limitation:

9.50 tpy of any individual HAP for entire facility, as a rolling 12-month summation

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of sections C.1 - C.4.

The monthly and rolling, 12-month individual HAP emissions from this emissions unit shall be calculated by summing the daily emission rates from section C.2. The calculated, rolling, 12-month individual HAP emissions from this emissions unit shall be added to the calculated, rolling, 12-month individual HAP emissions from all the other emissions units at the facility to obtain the rolling, 12-month individual HAP emissions for the entire facility.

Emission Limitation:

24.11 tpy of all HAPs for entire facility, as a rolling 12-month summation

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of sections C.1 - C.4.

The monthly and rolling, 12-month combined HAPs emissions from this emissions unit shall be calculated by summing the daily emission rates from section C.2. The calculated, rolling, 12-month combined HAPs emissions from this emissions unit shall be added to the calculated, rolling, 12-month combined HAPs emissions from all the other emissions units at the facility to obtain the rolling, 12-month combined HAPs emissions for the entire facility.

F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A, B, C, D, E, and F. The applicant has requested that such restrictions be imposed in order to limit the potential to emit for the facility and, therefore, avoid Title V applicability.

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

Facility ID: 1652050077 Emissions Unit ID: P009 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

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>
OB fill #2 - packaging of oil based paint	OAC rule 3745-31-05 (PTI 16-1979)	7.71 lbs/hr of organic compounds (OC) 40.0 lbs/day of OC 7.3 tpy of OC

See A.2.a below.

OAC rule 3745-21-07(G)(2)

See A.2.b through A.2.d below.

OAC rule 3745-35-07

2. Additional Terms and Conditions

- (a) The emissions limit based on this applicable rule is less stringent than the limit established pursuant to OAC rule 3745-31-05. Combined annual emissions from this facility shall not exceed the following limitations, as rolling, 12-month summations:

87.88 tons of volatile organic compounds (VOC);
 24.11 tons of combined hazardous air pollutants (HAP); and
 9.50 tons of each individual HAP.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month(s) Facility VOC Limit Facility Total HAP Limit Facility Individual HAP Limit

1	29.29 tons	8.04 tons	3.17 tons
1-2	29.29 tons	8.04 tons	3.17 tons
1-3	29.29 tons	8.04 tons	3.17 tons
1-4	29.29 tons	8.04 tons	3.17 tons
1-5	58.58 tons	16.08 tons	6.34 tons
1-6	58.58 tons	16.08 tons	6.34 tons
1-7	58.58 tons	16.08 tons	6.34 tons
1-8	58.58 tons	16.08 tons	6.34 tons
1-9	87.88 tons	24.11 tons	9.50 tons
1-10	87.88 tons	24.11 tons	9.50 tons
1-11	87.88 tons	24.11 tons	9.50 tons
1-12	87.88 tons	24.11 tons	9.50 tons

After the first 12 calendar months of operation following the issuance of this permit, compliance with the facility-wide VOC and HAP emission limitations shall be based upon rolling, 12-month summations of the monthly emissions, in tons.

The permittee shall include all OC in the calculation of VOC emissions. The permittee has requested this condition in order to streamline the record keeping requirements.

B. Operational Restrictions

- 1. None

C. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall collect and record the following information for each and every batch filled:
 - a. the filling date and ticket identification number;
 - b. the number of gallons filled;
 - c. the paint density, in pounds per gallon;
 - d. the VOC, individual HAP, and combined HAPs contents of each batch, as a weight fraction;
 - e. the fill running time, in hours;
 - f. the calculated VOC, individual HAP, and combined HAPs emission rates for each batch filled, i.e., (b)*(c)*(d)* (0.005), in pounds per day; and
 - g. the average hourly VOC emission rate, i.e., (the summation of (f) for all batches filled)/(e), in pounds/hour.

A filtration loss factor of 0.005 is used for the transfer of paint.

- 2. The permittee shall calculate and record the daily VOC, individual HAP, and combined HAPs emission rates for this emissions unit, in lbs/day, i.e., the summation of the VOC, individual HAP, and combined HAPs emissions from all batches filled each day.
- 3. For each month, the permittee shall collect and record the following information for each emissions unit at this facility:
 - a. the monthly VOC emissions, in tons;
 - b. the monthly emissions of each individual HAP, in tons; and
 - c. the monthly combined HAPs emissions, in tons.

- 4. The permittee shall, on a monthly basis, calculate and record the rolling 12-month, VOC, individual HAP, and combined HAPs emission rates for all emissions units at the facility, in tons.

D. Reporting Requirements

- 1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. an identification of each day during which the average hourly OC emissions from any batch filled exceeded 7.71 lbs/hr, and the actual average hourly OC emissions for batch filled; and
 - b. an identification of each day during which the OC emissions exceeded 40 lbs/day, and the actual OC emissions for each such day.
- 2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for VOC and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.

3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for each individual HAP and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.
4. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for total combined HAPs and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.
5. The quarterly deviation reports shall be submitted in accordance with the requirements specified in Part I-General Terms and Condition 3 of this permit.
6. The permittee shall submit annual reports that specify the total VOC, individual HAP, and combined HAPs emissions from the entire facility, in tons. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

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

7.71 lbs/hr of OC
40.0 lbs/day of OC
7.3 tpy of OC

Applicable Compliance Methods:

The permittee shall demonstrate compliance with the above limits based upon the record keeping requirements of sections C.1 and C.2.

Formulation data or USEPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the OC contents of the cleanup materials, coatings and inks.

Emission Limitation:

87.88 tpy of VOC for entire facility, as a rolling 12-month summation

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of sections C.1 - C.4.

The monthly and rolling, 12-month VOC emissions from this emissions unit shall be calculated by summing the daily emission rates from section C.2. [All OC emissions are included in the calculation of VOC emissions.] The calculated, rolling, 12-month VOC emissions from this emissions unit shall be added to the calculated, rolling, 12-month VOC emissions from all the other emissions units at the facility to obtain the rolling, 12-month VOC emissions for the entire facility.

Emission Limitation:

9.50 tpy of any individual HAP for entire facility, as a rolling 12-month summation

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of sections C.1 - C.4.

The monthly and rolling, 12-month individual HAP emissions from this emissions unit shall be calculated by summing the daily emission rates from section C.2. The calculated, rolling, 12-month individual HAP emissions from this emissions unit shall be added to the calculated, rolling, 12-month individual HAP emissions from all the other emissions units at the facility to obtain the rolling, 12-month individual HAP emissions for the entire facility.

Emission Limitation:

24.11 tpy of all HAPs for entire facility, as a rolling 12-month summation

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of sections C.1 - C.4.

The monthly and rolling, 12-month combined HAPs emissions from this emissions unit shall be calculated by summing the daily emission rates from section C.2. The calculated, rolling, 12-month combined HAPs emissions from this emissions unit shall be added to the calculated, rolling, 12-month combined HAPs emissions from all the other emissions units at the facility to obtain the rolling, 12-month combined HAPs emissions for the entire facility.

F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A, B, C, D, E, and F. The applicant has requested that such restrictions be imposed in order to limit the potential to emit for the facility and, therefore, avoid Title V applicability.

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

Facility ID: 1652050077 Emissions Unit ID: P011 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

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>
Latex fill equipment - 2 filter pots	OAC rule 3745-31-05 (PTI 16-1979)	0.72 lbs/hr of organic compounds (OC) 3.15 tpy of OC
	OAC rule 3745-21-07(G)(2)	See A.2.a below.
	OAC rule 3745-35-07	See A.2.b through A.2.d below.

2. Additional Terms and Conditions

- (a) The emissions limit based on this applicable rule is less stringent than the limit established pursuant to OAC rule 3745-31-05. Combined annual emissions from this facility shall not exceed the following limitations, as rolling, 12-month summations:

 87.88 tons of volatile organic compounds (VOC);
 24.11 tons of combined hazardous air pollutants (HAP); and
 9.50 tons of each individual HAP.
 To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month(s)	Facility VOC Limit	Facility Total HAP Limit	Facility Individual HAP Limit
1	29.29 tons	8.04 tons	3.17 tons
1-2	29.29 tons	8.04 tons	3.17 tons
1-3	29.29 tons	8.04 tons	3.17 tons
1-4	29.29 tons	8.04 tons	3.17 tons
1-5	58.58 tons	16.08 tons	6.34 tons
1-6	58.58 tons	16.08 tons	6.34 tons
1-7	58.58 tons	16.08 tons	6.34 tons
1-8	58.58 tons	16.08 tons	6.34 tons
1-9	87.88 tons	24.11 tons	9.50 tons
1-10	87.88 tons	24.11 tons	9.50 tons
1-11	87.88 tons	24.11 tons	9.50 tons
1-12	87.88 tons	24.11 tons	9.50 tons

After the first 12 calendar months of operation following the issuance of this permit, compliance with the facility-wide VOC and HAP emission limitations shall be based upon rolling, 12-month summations of the monthly emissions, in tons.
 The permittee shall include all OC in the calculation of VOC emissions. The permittee has requested this condition in order to streamline the record keeping requirements.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each and every batch filled:
 - a. the filling date and ticket identification number;
 - b. the number of gallons filled;
 - c. the paint density, in pounds per gallon;
 - d. the VOC, individual HAP, and combined HAPs contents of each batch, as a weight fraction;
 - e. the fill running time, in hours;

- f. the calculated VOC, individual HAP, and combined HAPs emission rates for each batch filled, i.e., (b)*(c)*(d)* (0.005), in pounds per day; and
- g. the average hourly VOC emission rate, i.e., (the summation of (f) for all batches filled)/(e), in pounds/hour.
- A filtration loss factor of 0.005 is used for the transfer of paint.
2. The permittee shall calculate and record the daily VOC, individual HAP, and combined HAPs emission rates for this emissions unit, in lbs/day, i.e., the summation of the VOC, individual HAP, and combined HAPs emissions from all batches filled each day.
3. For each month, the permittee shall collect and record the following information for each emissions unit at this facility:
- the monthly VOC emissions, in tons;
 - the monthly emissions of each individual HAP, in tons; and
 - the monthly combined HAPs emissions, in tons.
4. The permittee shall, on a monthly basis, calculate and record the rolling 12-month, VOC, individual HAP, and combined HAPs emission rates for all emissions units at the facility, in tons.
- D. Reporting Requirements**
- The permittee shall submit quarterly deviation (excursion) reports that include an identification of each filling run during which the average hourly OC emissions from the filling operation exceeded 0.72 pound per hour, and the actual average hourly OC emissions for each such transfer operation.
 - The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for VOC and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.
 - The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for each individual HAP and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.
 - The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for total combined HAPs and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.
 - The quarterly deviation reports shall be submitted in accordance with the requirements specified in Part I-General Terms and Condition 3 of this permit.
 - The permittee shall submit annual reports that specify the total VOC, individual HAP, and combined HAPs emissions from the entire facility, in tons. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
- E. Testing Requirements**
- Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:
Emission Limitations:
0.72 lb/hr of OC
3.15 tpy of OC
Applicable Compliance Methods:
The permittee shall demonstrate compliance with the above limits based upon the record keeping requirements of sections C.1 and C.2.
Formulation data or USEPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the OC contents of the cleanup materials, coatings and inks.
Emission Limitation:
87.88 tpy of VOC for entire facility, as a rolling 12-month summation
Applicable Compliance Method:
The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of sections C.1 - C.4.
The monthly and rolling, 12-month VOC emissions from this emissions unit shall be calculated by summing the daily emission rates from section C.2. [All OC emissions are included in the calculation of VOC emissions.] The calculated, rolling, 12-month VOC emissions from this emissions unit shall be added to the calculated, rolling, 12-month VOC emissions from all the other emissions units at the facility to obtain the rolling, 12-month VOC emissions for the entire facility.
Emission Limitation:
9.50 tpy of any individual HAP for entire facility, as a rolling 12-month summation
Applicable Compliance Method:
The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of sections C.1 - C.4.
The monthly and rolling, 12-month individual HAP emissions from this emissions unit shall be calculated by summing the daily emission rates from section C.2. The calculated, rolling, 12-month individual HAP emissions from this emissions unit shall be added to the calculated, rolling, 12-month individual HAP emissions from all

the other emissions units at the facility to obtain the rolling, 12-month individual HAP emissions for the entire facility.
Emission Limitation:

24.11 tpy of all HAPs for entire facility, as a rolling 12-month summation

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of sections C.1 - C.4.

The monthly and rolling, 12-month combined HAPs emissions from this emissions unit shall be calculated by summing the daily emission rates from section C.2. The calculated, rolling, 12-month combined HAPs emissions from this emissions unit shall be added to the calculated, rolling, 12-month combined HAPs emissions from all the other emissions units at the facility to obtain the rolling, 12-month combined HAPs emissions for the entire facility.

F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A, B, C, D, E, and F. The applicant has requested that such restrictions be imposed in order to limit the potential to emit for the facility and, therefore, avoid Title V applicability.

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

Facility ID: 1652050077 Emissions Unit ID: P012 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

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>
LB-2, 800-gallon mix vat - latex based paint process	OAC rule 3745-31-05 (PTI 16-1879)	0.91 lb/hr of organic compounds (OC) 3.99 tpy of OC
		5% opacity as a 6-minute average (stack emissions)
		0.86 lbs/hr of particulate emissions (PE) 3.77 tpy of PE
		See A.2.a below.
		See A.2.a below.
	OAC rule 3745-17-07	See A.2.a below.
	OAC rule 3745-17-11	See A.2.a below.
OAC rule 3745-21-07(G)(2)	See A.2.b through A.2.d below.	
OAC rule 3745-35-07		

2. Additional Terms and Conditions

- (a) The emissions limitation based on this applicable rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05. Combined annual emissions from this facility shall not exceed the following limitations, as rolling, 12-month summations:
 - 87.88 tons of volatile organic compounds (VOC);
 - 24.11 tons of combined hazardous air pollutants (HAP); and

9.50 tons of each individual HAP.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month(s) Facility VOC Limit Facility Total HAP Limit Facility Individual HAP Limit

1	29.29 tons	8.04 tons	3.17 tons
1-2	29.29 tons	8.04 tons	3.17 tons
1-3	29.29 tons	8.04 tons	3.17 tons
1-4	29.29 tons	8.04 tons	3.17 tons
1-5	58.58 tons	16.08 tons	6.34 tons
1-6	58.58 tons	16.08 tons	6.34 tons
1-7	58.58 tons	16.08 tons	6.34 tons
1-8	58.58 tons	16.08 tons	6.34 tons
1-9	87.88 tons	24.11 tons	9.50 tons
1-10	87.88 tons	24.11 tons	9.50 tons
1-11	87.88 tons	24.11 tons	9.50 tons
1-12	87.88 tons	24.11 tons	9.50 tons

After the first 12 calendar months of operation following the issuance of this permit, compliance with the facility-wide VOC and HAP emission limitations shall be based upon a rolling, 12-month summation of the combined annual emissions, in tons.

The permittee shall include all OC in the calculation of VOC emissions. The permittee has requested this condition in order to streamline the record keeping requirements.

B. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 4 to 7 inches of water while the emissions unit is in operation.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.
2. The permittee shall collect and record the following information for each and every day of production:
 - a. the production date and identification number of each batch produced;
 - b. the batch size, in gallons;
 - c. the batch density, in pounds per gallon;
 - d. the VOC, individual HAP, and combined HAPs contents of each batch, in weight percent;
 - e. the daily cycle time for the emissions unit, in hours;
 - f. the daily VOC, individual HAP, and combined HAPs emission rates, in pounds per day, i.e., the summation of the emissions from each batch produced that day; and
 - g. the calculated average hourly VOC emission rate for the daily production, in pounds of VOC per hour (average).

VOC, individual HAP, and combined HAPs emissions shall be calculated based upon the methodology specified in sections E.1.a, E.1.d, E.1.e and E.1.f below.
3. For each month, the permittee shall collect and record the following information for each emissions unit at this facility:
 - a. the monthly VOC emissions, in tons;
 - b. the monthly emissions of each individual HAP, in tons; and
 - c. the monthly combined HAPs emissions, in tons.
4. The permittee shall, on a monthly basis, calculate and record the rolling 12-month, VOC, individual HAP, and combined HAPs emission rates for all emissions units at the facility, in tons.

D. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports identify that all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the average hourly OC emissions from the daily production exceeded 0.91 lb/hr, and the actual average hourly OC emissions for the daily production.
3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for VOC and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.
4. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for each individual HAP and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.
5. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for total combined HAPs and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.
6. The quarterly deviation reports shall be submitted in accordance with the requirements specified in Part I-General

Terms and Condition 3 of this permit.

7. The permittee shall submit annual reports that specify the total VOC, individual HAP, and combined HAPs emissions from the entire facility, in tons. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

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

Emission Limitations:

0.91 lb/hr of OC
3.99 tpy of OC

Applicable Compliance Methods:

The permittee shall demonstrate compliance with the above limits based upon the record keeping requirements of section C.2 and C.3.

Formulation data or USEPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the OC contents of the cleanup materials, coatings and inks.

Daily and hourly VOC emissions shall be calculated in accordance with the following equations:

Daily VOC Emissions = [SUMMATION of (Size * Density * Weight Fraction * EF * (1 - CF)) for all batches produced during the day]

Where:

Daily VOC Emissions = VOC emission rate for the day's production, in pounds per day;

Size = batch size, in gallons;

Density = batch density, in pounds per gallon;

Weight Fraction = VOC content of each batch, as a weight fraction;

EF = solvent loss emission factor (AP-42, Section 6.4), 0.015; and

CF = control factor (from Control of VOC Emissions from Ink and Paint Manufacturing Processes, USEPA-450/3-92-013, Section 4.2.1.1) of 0.40, based on the use of a cover for the tank.

Hourly VOC emissions = Daily VOC Emissions / Time

Where:

Time = total daily production time, in hours.

Emission Limitation:

5% opacity as a 6-minute average
(stack emissions)

Applicable Compliance Method:

OAC rule 3745-17-03(B)(1)
Emission Limitation:

0.86 lb/hr of PE
3.77 tpy of PE

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the hourly emission limitation by testing in accordance with USEPA Methods 1 - 5, 40 CFR Part 60, Appendix A.

The annual emission limitation was developed by multiplying the hourly mass emission limitation by 8760 hours per year and dividing by 2000 to convert to tons. Therefore, compliance with the annual limitation will be ensured if compliance with the hourly limitation is maintained.

Emission Limitation:

87.88 tpy of VOC for entire facility, as a rolling 12-month summation

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of sections C.2 - C.4.

The monthly and rolling, 12-month VOC emissions from this emissions unit shall be calculated by summing the daily emission rates from section C.2. [All OC emissions are included in the calculation of VOC emissions.] The calculated, rolling, 12-month VOC emissions from this emissions unit shall be added to the calculated, rolling, 12-month VOC emissions from all the other emissions units at the facility to obtain the rolling, 12-month VOC emissions for the entire facility.

Emission Limitation:

9.50 tpy of any individual HAP for entire facility, as a rolling 12-month summation

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of sections C.2 - C.4.

Individual HAP emissions from this emissions unit shall be calculated in accordance with the following equation:

Individual HAP Emissions = [SUMMATION of (Size * Weight Fraction of Individual HAP * EF * (1 - CF)) for all batches produced during the day]

Where:

Individual HAP Emissions = Individual HAP emission rate for the day's production, in pounds per day;

Size = batch size, in gallons;

Density = batch density, in pounds per gallon;

Weight Fraction of Individual HAP = Individual HAP content of each batch, as a weight fraction;

EF = solvent loss emission factor (AP-42, Section 6.4), 0.015; and

CF = control factor (from Control of VOC Emissions from Ink and Paint Manufacturing Processes, USEPA-450/3-92-013, Section 4.2.1.1) of 0.40, based on the use of a cover for the tank.

The monthly and rolling, 12-month individual HAP emissions from this emissions unit shall be calculated by summing the daily emission rates from section C.2. The calculated, rolling, 12-month individual HAP emissions from this emissions unit shall be added to the calculated, rolling, 12-month individual HAP emissions from all the other emissions units at the facility to obtain the rolling, 12-month individual HAP emissions for the entire facility.

Emission Limitation:

24.11 tpy of all HAPs for entire facility, as a rolling 12-month summation

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of sections C.2 - C.4 of these T&C's.

Combined HAPs emissions from this emissions unit shall be calculated in accordance with the following equation:

Combined HAPs Emissions = [SUMMATION of (Size * Weight Fraction of Combined HAPs * EF * (1 - CF)) for all batches produced during the day]

Where:

Combined HAPs Emissions = Combined HAPs emission rate, as a 12-month rolling summation;

Size = batch size, in gallons;

Density = batch density, in pounds per gallon;

Weight Fraction of Combined HAPs = Combined HAPs content of each batch, as a weight fraction;

EF = solvent loss emission factor (AP-42, Section 6.4), 0.015; and

CF = control factor (from Control of VOC Emissions from Ink and Paint Manufacturing Processes, USEPA-450/3-92-013, Section 4.2.1.1) of 0.40, based on the use of a cover for the tank.

The monthly and rolling, 12-month combined HAPs emissions from this emissions unit shall be calculated by summing the daily emission rates from section C.2. The calculated, rolling, 12-month combined HAPs emissions from this emissions unit shall be added to the calculated, rolling, 12-month combined HAPs emissions from all the other emissions units at the facility to obtain the rolling, 12-month combined HAPs emissions for the entire facility.

F. **Miscellaneous Requirements**

1. The following terms and conditions of this permit are federally enforceable: A, B, C, D, E, and F. The applicant has requested that such restrictions be imposed in order to limit the potential to emit for the facility and, therefore, avoid Title V applicability.

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

Facility ID: 1652050077 Emissions Unit ID: P013 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

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>
LB-3, 800-gallon mix vat - latex based paint process	OAC rule 3745-31-05 (PTI 16-1879)	0.91 lb/hr of organic compounds (OC) 3.99 tpy of OC 5% opacity as a 6-minute average (stack emissions) 0.86 lbs/hr of particulate emissions (PE) 3.77 tpy of PE
		See A.2.a below.
	OAC rule 3745-17-07	See A.2.a below.
	OAC rule 3745-17-11	See A.2.a below.
	OAC rule 3745-21-07(G)(2)	See A.2.b through A.2.d below.
	OAC rule 3745-35-07	

2. Additional Terms and Conditions

- (a) The emissions limitation based on this applicable rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05. Combined annual emissions from this facility shall not exceed the following limitations, as rolling, 12-month summations:

87.88 tons of volatile organic compounds (VOC);
24.11 tons of combined hazardous air pollutants (HAP); and
9.50 tons of each individual HAP.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month(s)	Facility VOC Limit	Facility Total HAP Limit	Facility Individual HAP Limit
1	29.29 tons	8.04 tons	3.17 tons
1-2	29.29 tons	8.04 tons	3.17 tons
1-3	29.29 tons	8.04 tons	3.17 tons
1-4	29.29 tons	8.04 tons	3.17 tons
1-5	58.58 tons	16.08 tons	6.34 tons
1-6	58.58 tons	16.08 tons	6.34 tons
1-7	58.58 tons	16.08 tons	6.34 tons
1-8	58.58 tons	16.08 tons	6.34 tons
1-9	87.88 tons	24.11 tons	9.50 tons
1-10	87.88 tons	24.11 tons	9.50 tons
1-11	87.88 tons	24.11 tons	9.50 tons
1-12	87.88 tons	24.11 tons	9.50 tons

After the first 12 calendar months of operation following the issuance of this permit, compliance with the facility-wide VOC and HAP emission limitations shall be based upon a rolling, 12-month summation of the combined annual emissions, in tons.

The permittee shall include all OC in the calculation of VOC emissions. The permittee has requested this condition in order to streamline the record keeping requirements.

B. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 4 to 7 inches of water while the emissions unit is in operation.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.
2. The permittee shall collect and record the following information for each and every day of production:

- a. the production date and identification number of each batch produced;
 - b. the batch size, in gallons;
 - c. the batch density, in pounds per gallon;
 - d. the VOC, individual HAP, and combined HAPs contents of each batch, in weight percent;
 - e. the daily cycle time for the emissions unit, in hours;
 - f. the daily VOC, individual HAP, and combined HAPs emission rates, in pounds per day, i.e., the summation of the emissions from each batch produced that day; and
 - g. the calculated average hourly VOC emission rate for the daily production, in pounds of VOC per hour (average).

VOC, individual HAP, and combined HAPs emissions shall be calculated based upon the methodology specified in sections E.1.a, E.1.d, E.1.e and E.1.f below.
 3. For each month, the permittee shall collect and record the following information for each emissions unit at this facility:
 - a. the monthly VOC emissions, in tons;
 - b. the monthly emissions of each individual HAP, in tons; and
 - c. the monthly combined HAPs emissions, in tons.
 4. The permittee shall, on a monthly basis, calculate and record the rolling 12-month, VOC, individual HAP, and combined HAPs emission rates for all emissions units at the facility, in tons.
- D. Reporting Requirements**
1. The permittee shall submit quarterly pressure drop deviation (excursion) reports identify that all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
 2. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the average hourly OC emissions from the daily production exceeded 0.91 lb/hr, and the actual average hourly OC emissions for the daily production.
 3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for VOC and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.
 4. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for each individual HAP and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.
 5. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for total combined HAPs and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.
 6. The quarterly deviation reports shall be submitted in accordance with the requirements specified in Part I-General Terms and Condition 3 of this permit.
 7. The permittee shall submit annual reports that specify the total VOC, individual HAP, and combined HAPs emissions from the entire facility, in tons. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
- E. Testing Requirements**
1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:
Emission Limitations:
0.91 lb/hr of OC
3.99 tpy of OC

Applicable Compliance Methods:

The permittee shall demonstrate compliance with the above limits based upon the record keeping requirements of section C.2 and C.3.

Formulation data or USEPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the OC contents of the cleanup materials, coatings and inks.

Daily and hourly VOC emissions shall be calculated in accordance with the following equations:

Daily VOC Emissions = [SUMMATION of (Size * Density * Weight Fraction * EF * (1 - CF))] for all batches produced during the day]

Where:

Daily VOC Emissions = VOC emission rate for the day's production, in pounds per day;

Size = batch size, in gallons;

Density = batch density, in pounds per gallon;

Weight Fraction = VOC content of each batch, as a weight fraction;

EF = solvent loss emission factor (AP-42, Section 6.4), 0.015; and

CF = control factor (from Control of VOC Emissions from Ink and Paint Manufacturing Processes, USEPA-450/3-92-013, Section 4.2.1.1) of 0.40, based on the use of a cover for the tank.

Hourly VOC emissions = Daily VOC Emissions / Time

Where:

Time = total daily production time, in hours.

Emission Limitation:

5% opacity as a 6-minute average
(stack emissions)

Applicable Compliance Method:

OAC rule 3745-17-03(B)(1)

Emission Limitation:

0.86 lb/hr of PE
3.77 tpy of PE

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the hourly emission limitation by testing in accordance with USEPA Methods 1 - 5, 40 CFR Part 60, Appendix A.

The annual emission limitation was developed by multiplying the hourly mass emission limitation by 8760 hours per year and dividing by 2000 to convert to tons. Therefore, compliance with the annual limitation will be ensured if compliance with the hourly limitation is maintained.

Emission Limitation:

87.88 tpy of VOC for entire facility, as a rolling 12-month summation

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of sections C.2 - C.4.

The monthly and rolling, 12-month VOC emissions from this emissions unit shall be calculated by summing the daily emission rates from section C.2. [All OC emissions are included in the calculation of VOC emissions.] The calculated, rolling, 12-month VOC emissions from this emissions unit shall be added to the calculated, rolling, 12-month VOC emissions from all the other emissions units at the facility to obtain the rolling, 12-month VOC emissions for the entire facility.

Emission Limitation:

9.50 tpy of any individual HAP for entire facility, as a rolling 12-month summation

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of sections C.2 - C.4.

Individual HAP emissions from this emissions unit shall be calculated in accordance with the following equation:

Individual HAP Emissions = [SUMMATION of (Size * Weight Fraction of Individual HAP * EF * (1 - CF)) for all batches produced during the day]

Where:

Individual HAP Emissions = Individual HAP emission rate for the day's production, in pounds per day;

Size = batch size, in gallons;

Density = batch density, in pounds per gallon;

Weight Fraction of Individual HAP = Individual HAP content of each batch, as a weight fraction;

EF = solvent loss emission factor (AP-42, Section 6.4), 0.015; and

CF = control factor (from Control of VOC Emissions from Ink and Paint Manufacturing Processes, USEPA-450/3-92-013, Section 4.2.1.1) of 0.40, based on the use of a cover for the tank.

The monthly and rolling, 12-month individual HAP emissions from this emissions unit shall be calculated by summing the daily emission rates from section C.2. The calculated, rolling, 12-month individual HAP emissions from this emissions unit shall be added to the calculated, rolling, 12-month individual HAP emissions from all the other emissions units at the facility to obtain the rolling, 12-month individual HAP emissions for the entire facility.

Emission Limitation:

24.11 tpy of all HAPs for entire facility, as a rolling 12-month summation

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of sections C.2 - C.4 of these T&C's.

Combined HAPs emissions from this emissions unit shall be calculated in accordance with the following equation:

Combined HAPs Emissions = [SUMMATION of (Size * Weight Fraction of Combined HAPs * EF * (1 - CF))] for all batches produced during the day]

Where:

Combined HAPs Emissions = Combined HAPs emission rate, as a 12-month rolling summation;

Size = batch size, in gallons;

Density = batch density, in pounds per gallon;

Weight Fraction of Combined HAPs = Combined HAPs content of each batch, as a weight fraction;

EF = solvent loss emission factor (AP-42, Section 6.4), 0.015; and

CF = control factor (from Control of VOC Emissions from Ink and Paint Manufacturing Processes, USEPA-450/3-92-013, Section 4.2.1.1) of 0.40, based on the use of a cover for the tank.

The monthly and rolling, 12-month combined HAPs emissions from this emissions unit shall be calculated by summing the daily emission rates from section C.2. The calculated, rolling, 12-month combined HAPs emissions from this emissions unit shall be added to the calculated, rolling, 12-month combined HAPs emissions from all the other emissions units at the facility to obtain the rolling, 12-month combined HAPs emissions for the entire facility.

F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A, B, C, D, E, and F. The applicant has requested that such restrictions be imposed in order to limit the potential to emit for the facility and, therefore, avoid Title V applicability.

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

Facility ID: 1652050077 Emissions Unit ID: P014 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

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>
LB-4, 400-gallon mix vat - latex based paint process	OAC rule 3745-31-05 (PTI 16-1879)	0.57 lb/hr of organic compounds (OC) 2.50 tpy of OC 5% opacity as a 6-minute average (stack emissions) 0.41 lbs/hr of particulate emissions (PE) 1.80 tpy of PE
		See A.2.a below.
		See A.2.a below.
	OAC rule 3745-17-07	See A.2.a below.
	OAC rule 3745-17-11	See A.2.a below.

See A.2.b through A.2.d below.

OAC rule 3745-21-07(G)(2)

OAC rule 3745-35-07

2. Additional Terms and Conditions

- (a) The emissions limitation based on this applicable rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05. Combined annual emissions from this facility shall not exceed the following limitations, as rolling, 12-month summations:

87.88 tons of volatile organic compounds (VOC);
 24.11 tons of combined hazardous air pollutants (HAP); and
 9.50 tons of each individual HAP.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month(s) Facility VOC Limit Facility Total HAP Limit Facility Individual HAP Limit

1	29.29 tons	8.04 tons	3.17 tons
1-2	29.29 tons	8.04 tons	3.17 tons
1-3	29.29 tons	8.04 tons	3.17 tons
1-4	29.29 tons	8.04 tons	3.17 tons
1-5	58.58 tons	16.08 tons	6.34 tons
1-6	58.58 tons	16.08 tons	6.34 tons
1-7	58.58 tons	16.08 tons	6.34 tons
1-8	58.58 tons	16.08 tons	6.34 tons
1-9	87.88 tons	24.11 tons	9.50 tons
1-10	87.88 tons	24.11 tons	9.50 tons
1-11	87.88 tons	24.11 tons	9.50 tons
1-12	87.88 tons	24.11 tons	9.50 tons

After the first 12 calendar months of operation following the issuance of this permit, compliance with the facility-wide VOC and HAP emission limitations shall be based upon a rolling, 12-month summation of the combined annual emissions, in tons.

The permittee shall include all OC in the calculation of VOC emissions. The permittee has requested this condition in order to streamline the record keeping requirements.

B. Operational Restrictions

- 1. The pressure drop across the baghouse shall be maintained within the range of 4 to 7 inches of water while the emissions unit is in operation.

C. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.
- 2. The permittee shall collect and record the following information for each and every day of production:
 - a. the production date and identification number of each batch produced;
 - b. the batch size, in gallons;
 - c. the batch density, in pounds per gallon;
 - d. the VOC, individual HAP, and combined HAPs contents of each batch, in weight percent;
 - e. the daily cycle time for the emissions unit, in hours;
 - f. the daily VOC, individual HAP, and combined HAPs emission rates, in pounds per day, i.e., the summation of the emissions from each batch produced that day; and
 - g. the calculated average hourly VOC emission rate for the daily production, in pounds of VOC per hour (average).

VOC, individual HAP, and combined HAPs emissions shall be calculated based upon the methodology specified in sections E.1.a, E.1.d, E.1.e and E.1.f below.

- 3. For each month, the permittee shall collect and record the following information for each emissions unit at this facility:
 - a. the monthly VOC emissions, in tons;
 - b. the monthly emissions of each individual HAP, in tons; and
 - c. the monthly combined HAPs emissions, in tons.

- 4. The permittee shall, on a monthly basis, calculate and record the rolling 12-month, VOC, individual HAP, and combined HAPs emission rates for all emissions units at the facility, in tons.

D. Reporting Requirements

- 1. The permittee shall submit quarterly pressure drop deviation (excursion) reports identify that all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
- 2. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the average hourly OC emissions from the daily production exceeded 0.91 lb/hr, and the actual average hourly OC emissions for the daily production.

3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for VOC and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.
4. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for each individual HAP and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.
5. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for total combined HAPs and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.
6. The quarterly deviation reports shall be submitted in accordance with the requirements specified in Part I-General Terms and Condition 3 of this permit.
7. The permittee shall submit annual reports that specify the total VOC, individual HAP, and combined HAPs emissions from the entire facility, in tons. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

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

Emission Limitations:

0.57 lb/hr of OC
2.50 tpy of OC

Applicable Compliance Methods:

The permittee shall demonstrate compliance with the above limits based upon the record keeping requirements of section C.2 and C.3.

Formulation data or USEPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the OC contents of the cleanup materials, coatings and inks.

Daily and hourly VOC emissions shall be calculated in accordance with the following equations:

Daily VOC Emissions = [SUMMATION of (Size * Density * Weight Fraction * EF * (1 - CF))] for all batches produced during the day]

Where:

Daily VOC Emissions = VOC emission rate for the day's production, in pounds per day;

Size = batch size, in gallons;

Density = batch density, in pounds per gallon;

Weight Fraction = VOC content of each batch, as a weight fraction;

EF = solvent loss emission factor (AP-42, Section 6.4), 0.015; and

CF = control factor (from Control of VOC Emissions from Ink and Paint Manufacturing Processes, USEPA-450/3-92-013, Section 4.2.1.1) of 0.40, based on the use of a cover for the tank.

Hourly VOC emissions = Daily VOC Emissions / Time

Where:

Time = total daily production time, in hours.

Emission Limitation:

5% opacity as a 6-minute average
(stack emissions)

Applicable Compliance Method:

OAC rule 3745-17-03(B)(1)
Emission Limitation:

0.41 lb/hr of PE
1.80 tpy of PE

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the hourly emission limitation by testing in accordance with USEPA Methods 1 - 5, 40 CFR Part 60, Appendix A.

The annual emission limitation was developed by multiplying the hourly mass emission limitation by 8760 hours per year and dividing by 2000 to convert to tons. Therefore, compliance with the annual limitation will be ensured if compliance with the hourly limitation is maintained.

Emission Limitation:

87.88 tpy of VOC for entire facility, as a rolling 12-month summation

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of sections C.2 - C.4.

The monthly and rolling, 12-month VOC emissions from this emissions unit shall be calculated by summing the daily emission rates from section C.2. [All OC emissions are included in the calculation of VOC emissions.] The calculated, rolling, 12-month VOC emissions from this emissions unit shall be added to the calculated, rolling, 12-month VOC emissions from all the other emissions units at the facility to obtain the rolling, 12-month VOC emissions for the entire facility.

Emission Limitation:

9.50 tpy of any individual HAP for entire facility, as a rolling 12-month summation

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of sections C.2 - C.4.

Individual HAP emissions from this emissions unit shall be calculated in accordance with the following equation:

Individual HAP Emissions = [SUMMATION of (Size * Weight Fraction of Individual HAP * EF * (1 - CF)) for all batches produced during the day]

Where:

Individual HAP Emissions = Individual HAP emission rate for the day's production, in pounds per day;

Size = batch size, in gallons;

Density = batch density, in pounds per gallon;

Weight Fraction of Individual HAP = Individual HAP content of each batch, as a weight fraction;

EF = solvent loss emission factor (AP-42, Section 6.4), 0.015; and

CF = control factor (from Control of VOC Emissions from Ink and Paint Manufacturing Processes, USEPA-450/3-92-013, Section 4.2.1.1) of 0.40, based on the use of a cover for the tank.

The monthly and rolling, 12-month individual HAP emissions from this emissions unit shall be calculated by summing the daily emission rates from section C.2. The calculated, rolling, 12-month individual HAP emissions from this emissions unit shall be added to the calculated, rolling, 12-month individual HAP emissions from all the other emissions units at the facility to obtain the rolling, 12-month individual HAP emissions for the entire facility.

Emission Limitation:

24.11 tpy of all HAPs for entire facility, as a rolling 12-month summation

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of sections C.2 - C.4 of these T&C's.

Combined HAPs emissions from this emissions unit shall be calculated in accordance with the following equation:

Combined HAPs Emissions = [SUMMATION of (Size * Weight Fraction of Combined HAPs * EF * (1 - CF)) for all batches produced during the day]

Where:

Combined HAPs Emissions = Combined HAPs emission rate, as a 12-month rolling summation;

Size = batch size, in gallons;

Density = batch density, in pounds per gallon;

Weight Fraction of Combined HAPs = Combined HAPs content of each batch, as a weight fraction;

EF = solvent loss emission factor (AP-42, Section 6.4), 0.015; and

CF = control factor (from Control of VOC Emissions from Ink and Paint Manufacturing Processes, USEPA-450/3-92-013, Section 4.2.1.1) of 0.40, based on the use of a cover for the tank.

The monthly and rolling, 12-month combined HAPs emissions from this emissions unit shall be calculated by summing the daily emission rates from section C.2. The calculated, rolling, 12-month combined HAPs emissions from this emissions unit shall be added to the calculated, rolling, 12-month combined HAPs emissions from all the other emissions units at the facility to obtain the rolling, 12-month combined HAPs emissions for the entire facility.

F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A, B, C, D, E, and F. The applicant has requested that such restrictions be imposed in order to limit the potential to emit for the facility and, therefore, avoid Title V applicability.

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

Facility ID: 1652050077 Emissions Unit ID: P015 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

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>
LB-5, 200-gallon mix vat - latex based paint process	OAC rule 3745-31-05 (PTI 16-1879)	0.38 lb/hr of organic compounds (OC) 1.66 tpy of OC
		5% opacity as a 6-minute average (stack emissions)
		0.24 lbs/hr of particulate emissions (PE) 1.05 tpy of PE
		See A.2.a below.
		See A.2.a below.
	OAC rule 3745-17-07	See A.2.a below.
	OAC rule 3745-17-11	See A.2.a below.
	OAC rule 3745-21-07(G)(2)	See A.2.b through A.2.d below.
	OAC rule 3745-35-07	

2. Additional Terms and Conditions

- (a) The emissions limitation based on this applicable rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05. Combined annual emissions from this facility shall not exceed the following limitations, as rolling, 12-month summations:

87.88 tons of volatile organic compounds (VOC);
24.11 tons of combined hazardous air pollutants (HAP); and
9.50 tons of each individual HAP.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month(s) Facility VOC Limit Facility Total HAP Limit Facility Individual HAP Limit

1	29.29 tons	8.04 tons	3.17 tons
1-2	29.29 tons	8.04 tons	3.17 tons
1-3	29.29 tons	8.04 tons	3.17 tons
1-4	29.29 tons	8.04 tons	3.17 tons
1-5	58.58 tons	16.08 tons	6.34 tons
1-6	58.58 tons	16.08 tons	6.34 tons
1-7	58.58 tons	16.08 tons	6.34 tons
1-8	58.58 tons	16.08 tons	6.34 tons
1-9	87.88 tons	24.11 tons	9.50 tons
1-10	87.88 tons	24.11 tons	9.50 tons
1-11	87.88 tons	24.11 tons	9.50 tons
1-12	87.88 tons	24.11 tons	9.50 tons

After the first 12 calendar months of operation following the issuance of this permit, compliance with the facility-wide VOC and HAP emission limitations shall be based upon a rolling, 12-month summation of the combined annual emissions, in tons.

The permittee shall include all OC in the calculation of VOC emissions. The permittee has requested this condition in order to streamline the record keeping requirements.

B. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 4 to 7 inches of water while the emissions unit is in operation.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.
2. The permittee shall collect and record the following information for each and every day of production:
 - a. the production date and identification number of each batch produced;
 - b. the batch size, in gallons;
 - c. the batch density, in pounds per gallon;
 - d. the VOC, individual HAP, and combined HAPs contents of each batch, in weight percent;
 - e. the daily cycle time for the emissions unit, in hours;
 - f. the daily VOC, individual HAP, and combined HAPs emission rates, in pounds per day, i.e., the summation of the emissions from each batch produced that day; and
 - g. the calculated average hourly VOC emission rate for the daily production, in pounds of VOC per hour (average).

VOC, individual HAP, and combined HAPs emissions shall be calculated based upon the methodology specified in sections E.1.a, E.1.d, E.1.e and E.1.f below.
3. For each month, the permittee shall collect and record the following information for each emissions unit at this facility:
 - a. the monthly VOC emissions, in tons;
 - b. the monthly emissions of each individual HAP, in tons; and
 - c. the monthly combined HAPs emissions, in tons.
4. The permittee shall, on a monthly basis, calculate and record the rolling 12-month, VOC, individual HAP, and combined HAPs emission rates for all emissions units at the facility, in tons.

D. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports identify that all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the average hourly OC emissions from the daily production exceeded 0.91 lb/hr, and the actual average hourly OC emissions for the daily production.
3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for VOC and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.
4. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for each individual HAP and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.
5. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for total combined HAPs and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.
6. The quarterly deviation reports shall be submitted in accordance with the requirements specified in Part I-General Terms and Condition 3 of this permit.
7. The permittee shall submit annual reports that specify the total VOC, individual HAP, and combined HAPs emissions from the entire facility, in tons. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

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

Emission Limitations:

0.38 lb/hr of OC
1.66 tpy of OC

Applicable Compliance Methods:

The permittee shall demonstrate compliance with the above limits based upon the record keeping requirements of section C.2 and C.3.

Formulation data or USEPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the OC contents of the cleanup materials, coatings and inks.

Daily and hourly VOC emissions shall be calculated in accordance with the following equations:

Daily VOC Emissions = [SUMMATION of (Size * Density * Weight Fraction * EF * (1 - CF)) for all batches produced during the day]

Where:

Daily VOC Emissions = VOC emission rate for the day's production, in pounds per day;

Size = batch size, in gallons;

Density = batch density, in pounds per gallon;

Weight Fraction = VOC content of each batch, as a weight fraction;

EF = solvent loss emission factor (AP-42, Section 6.4), 0.015; and

CF = control factor (from Control of VOC Emissions from Ink and Paint Manufacturing Processes, USEPA-450/3-92-013, Section 4.2.1.1) of 0.40, based on the use of a cover for the tank.

Hourly VOC emissions = Daily VOC Emissions / Time

Where:

Time = total daily production time, in hours.

Emission Limitation:

5% opacity as a 6-minute average
(stack emissions)

Applicable Compliance Method:

OAC rule 3745-17-03(B)(1)

Emission Limitation:

0.24 lb/hr of PE
1.05 tpy of PE

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the hourly emission limitation by testing in accordance with USEPA Methods 1 - 5, 40 CFR Part 60, Appendix A.

The annual emission limitation was developed by multiplying the hourly mass emission limitation by 8760 hours per year and dividing by 2000 to convert to tons. Therefore, compliance with the annual limitation will be ensured if compliance with the hourly limitation is maintained.

Emission Limitation:

87.88 tpy of VOC for entire facility, as a rolling 12-month summation

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of sections C.2 - C.4.

The monthly and rolling, 12-month VOC emissions from this emissions unit shall be calculated by summing the daily emission rates from section C.2. [All OC emissions are included in the calculation of VOC emissions.] The calculated, rolling, 12-month VOC emissions from this emissions unit shall be added to the calculated, rolling, 12-month VOC emissions from all the other emissions units at the facility to obtain the rolling, 12-month VOC emissions for the entire facility.

Emission Limitation:

9.50 tpy of any individual HAP for entire facility, as a rolling 12-month summation

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of sections C.2 - C.4.

Individual HAP emissions from this emissions unit shall be calculated in accordance with the following equation:

Individual HAP Emissions = [SUMMATION of (Size * Weight Fraction of Individual HAP * EF * (1 - CF)) for all batches produced during the day]

Where:

Individual HAP Emissions = Individual HAP emission rate for the day's production, in pounds per day;

Size = batch size, in gallons;

Density = batch density, in pounds per gallon;

Weight Fraction of Individual HAP = Individual HAP content of each batch, as a weight fraction;

EF = solvent loss emission factor (AP-42, Section 6.4), 0.015; and

CF = control factor (from Control of VOC Emissions from Ink and Paint Manufacturing Processes, USEPA-

450/3-92-013, Section 4.2.1.1) of 0.40, based on the use of a cover for the tank.

The monthly and rolling, 12-month individual HAP emissions from this emissions unit shall be calculated by summing the daily emission rates from section C.2. The calculated, rolling, 12-month individual HAP emissions from this emissions unit shall be added to the calculated, rolling, 12-month individual HAP emissions from all the other emissions units at the facility to obtain the rolling, 12-month individual HAP emissions for the entire facility.

Emission Limitation:

24.11 tpy of all HAPs for entire facility, as a rolling 12-month summation

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of sections C.2 - C.4 of these T&C's.

Combined HAPs emissions from this emissions unit shall be calculated in accordance with the following equation:

Combined HAPs Emissions = [SUMMATION of (Size * Weight Fraction of Combined HAPs * EF * (1 - CF)) for all batches produced during the day]

Where:

Combined HAPs Emissions = Combined HAPs emission rate, as a 12-month rolling summation;

Size = batch size, in gallons;

Density = batch density, in pounds per gallon;

Weight Fraction of Combined HAPs = Combined HAPs content of each batch, as a weight fraction;

EF = solvent loss emission factor (AP-42, Section 6.4), 0.015; and

CF = control factor (from Control of VOC Emissions from Ink and Paint Manufacturing Processes, USEPA-450/3-92-013, Section 4.2.1.1) of 0.40, based on the use of a cover for the tank.

The monthly and rolling, 12-month combined HAPs emissions from this emissions unit shall be calculated by summing the daily emission rates from section C.2. The calculated, rolling, 12-month combined HAPs emissions from this emissions unit shall be added to the calculated, rolling, 12-month combined HAPs emissions from all the other emissions units at the facility to obtain the rolling, 12-month combined HAPs emissions for the entire facility.

F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A, B, C, D, E, and F. The applicant has requested that such restrictions be imposed in order to limit the potential to emit for the facility and, therefore, avoid Title V applicability.

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

Facility ID: 1652050077 Emissions Unit ID: P016 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

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>
RC #1, 1404-gallon mix vat - roof coating, adhesives, and primer process	OAC rule 3745-17-07	20% opacity as a 6-minute average, except as provided by rule (stack emissions)

OAC rule 3745-17-11 2.64 lbs/hr of particulate emissions (PE)
(based on 1,037 lbs/hr maximum process weight rate)

OAC rule 3745-21-07(G)(2) 8.0 lbs/hr of organic compounds (OC)
40.0 lbs/day of OC

OAC rule 3745-35-07 See A.2.a through A.2.b below.

2. Additional Terms and Conditions

(a) Combined annual emissions from this facility shall not exceed the following emission limitations, as rolling 12-month summations:

87.88 tons of volatile organic compounds (VOC);
24.11 tons of combined hazardous air pollutants (HAP); and
9.50 tons of each individual HAP.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month(s)	Facility VOC Limit	Facility Total HAP Limit	Facility Individual HAP Limit
1	29.29 tons	8.04 tons	3.17 tons
1-2	29.29 tons	8.04 tons	3.17 tons
1-3	29.29 tons	8.04 tons	3.17 tons
1-4	29.29 tons	8.04 tons	3.17 tons
1-5	58.58 tons	16.08 tons	6.34 tons
1-6	58.58 tons	16.08 tons	6.34 tons
1-7	58.58 tons	16.08 tons	6.34 tons
1-8	58.58 tons	16.08 tons	6.34 tons
1-9	87.88 tons	24.11 tons	9.50 tons
1-10	87.88 tons	24.11 tons	9.50 tons
1-11	87.88 tons	24.11 tons	9.50 tons
1-12	87.88 tons	24.11 tons	9.50 tons

After the first 12 calendar months of operation following the issuance of this permit, compliance with the facility-wide VOC and HAP emission limitations shall be based upon rolling, 12-month summations of the combined annual emissions, in tons.

The permittee shall include all OC in the calculation of VOC emissions. The permittee has requested this condition in order to streamline the record keeping requirements.

B. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 4 to 7 inches of water while the emissions unit is in operation.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.

2. The permittee shall collect and record the following information for each and every day of production:

- a. the production date and identification number of each batch produced;
- b. the batch size, in gallons;
- c. the batch density, in pounds per gallon;
- d. the VOC, individual HAP, and combined HAPs contents of each batch, in weight percent;
- e. the daily cycle time for the emissions unit, in hours;
- f. the daily VOC, individual HAP, and combined HAPs emission rates, in pounds per day, i.e., the summation of the emissions from each batch produced that day; and
 - g. the calculated average hourly VOC emission rate for the daily production, in pounds of VOC per hour (average).

VOC, individual HAP, and combined HAPs emissions shall be calculated based upon the methodology specified in sections E.1.a, E.1.d, E.1.e and E.1.f below.

3. For each month, the permittee shall collect and record the following information for each emissions unit at this facility:

- a. the monthly VOC emissions, in tons;
- b. the monthly emissions of each individual HAP, in tons; and
- c. the monthly combined HAPs emissions, in tons.

4. The permittee shall, on a monthly basis, calculate and record the rolling 12-month, VOC, individual HAP, and combined HAPs emission rates for all emissions units at the facility, in tons.

D. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. an identification of each day during which the average hourly OC emissions from the daily production exceeded 8 lbs/hr, and the actual average hourly OC emissions for the daily production; and
 - b. an identification of each day during which the OC emissions exceeded 40 lbs/day, and the actual OC emissions for each such day.
3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for VOC and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.
4. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for each individual HAP and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.
5. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for total combined HAPs and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.
6. The quarterly deviation reports shall be submitted in accordance with the requirements specified in Part I-General Terms and Condition 3 of this permit.
7. The permittee shall submit annual reports that specify the total VOC, total individual HAP, and combined HAPs emissions from the entire facility, in tons. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

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

8.0 lbs/hr of OC
40.0 lbs/day of OC

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limits based upon the record keeping requirements of section C.2.

Formulation data or USEPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the OC contents of the cleanup materials, coatings and inks.

Daily and hourly VOC emissions shall be calculated in accordance with the following equations:

Daily VOC Emissions = [SUMMATION of (Size * Density * Weight Fraction * EF * (1 - CF)) for all batches produced during the day]

Where:

Daily VOC Emissions = VOC emission rate for the day's production, in pounds per day;

Size = batch size, in gallons;

Density = batch density, in pounds per gallon;

Weight Fraction = VOC content of each batch, as a weight fraction;

EF = solvent loss emission factor (AP-42, Section 6.4), 0.015; and

CF = control factor (from Control of VOC Emissions from Ink and Paint Manufacturing Processes, USEPA-450/3-92-013, Section 4.2.1.1) of 0.40, based on the use of a cover for the tank.

Hourly VOC emissions = Daily VOC Emissions / Time

Where:

Time = total daily production time, in hours.

Emission Limitation:

20% opacity as a 6-minute average, except as provided by rule (stack emissions)

Applicable Compliance Method:

OAC rule 3745-17-03(B)(1)

Emission Limitation:

2.64 lb/hr of PE

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance by testing in accordance with Method 5, 40 CFR Part 60, Appendix A.

Emission Limitation:

87.88 tpy of VOC for entire facility, as a rolling 12-month summation

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of sections C.2 - C.4.

The monthly and rolling, 12-month VOC emissions from this emissions unit shall be calculated by summing the daily emission rates from section C.2. [All OC emissions are included in the calculation of VOC emissions.] The calculated, rolling, 12-month VOC emissions from this emissions unit shall be added to the calculated, rolling, 12-month VOC emissions from all the other emissions units at the facility to obtain the rolling, 12-month VOC emissions for the entire facility.

Emission Limitation:

9.50 tpy of each individual HAP for entire facility, as a rolling 12-month summation

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of sections C.2 - C.4.

Individual HAP emissions from this emissions unit shall be calculated in accordance with the following equation:

Individual HAP Emissions = [SUMMATION of (Size * Weight Fraction of Individual HAP * EF * (1 - CF))] for all batches produced during the day]

Where:

Individual HAP Emissions = Individual HAP emission rate for the day's production, in pounds per day;

Size = batch size, in gallons;

Density = batch density, in pounds per gallon;

Weight Fraction of Individual HAP = Individual HAP content of each batch, as a weight fraction;

EF = solvent loss emission factor (AP-42, Section 6.4), 0.015; and

CF = control factor (from Control of VOC Emissions from Ink and Paint Manufacturing Processes, USEPA-450/3-92-013, Section 4.2.1.1) of 0.40, based on the use of a cover for the tank.

The monthly and rolling, 12-month individual HAP emissions from this emissions unit shall be calculated by summing the daily emission rates from section C.2. The calculated, rolling, 12-month individual HAP emissions from this emissions unit shall be added to the calculated, rolling, 12-month individual HAP emissions from all the other emissions units at the facility to obtain the rolling, 12-month individual HAP emissions for the entire facility.

Emission Limitation:

24.11 tpy of all HAPs for entire facility, as a rolling 12-month summation

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of sections C.2 - C.4.

Combined HAPs emissions from this emissions unit shall be calculated in accordance with the following equation:

Combined HAPs Emissions = [SUMMATION of (Size * Weight Fraction of Combined HAPs * EF * (1 - CF))] for all batches produced during the day]

Where:

Combined HAPs Emissions = Combined HAPs emission rate, as a 12-month rolling summation;

Size = batch size, in gallons;

Density = batch density, in pounds per gallon;

Weight Fraction of Combined HAPs = Combined HAPs content of each batch, as a weight fraction;

EF = solvent loss emission factor (AP-42, Section 6.4), 0.015; and

CF = control factor (from Control of VOC Emissions from Ink and Paint Manufacturing Processes, USEPA-450/3-92-013, Section 4.2.1.1) of 0.40, based on the use of a cover for the tank.

The monthly and rolling, 12-month combined HAPs emissions from this emissions unit shall be calculated by summing the daily emission rates from section C.2. The calculated, rolling, 12-month combined HAPs emissions from this emissions unit shall be added to the calculated, rolling, 12-month combined HAPs emissions from all the other emissions units at the facility to obtain the rolling, 12-month combined HAPs emissions for the entire facility.

F. **Miscellaneous Requirements**

1. The following terms and conditions of this permit are federally enforceable: A, B, C, D, E, and F. The applicant has requested that such restrictions be imposed in order to limit the potential to emit for the facility and, therefore, avoid Title V applicability.

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

Facility ID: 1652050077 Emissions Unit ID: P017 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

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>
RC #2, 1667-gallon mix vat - roof coating, adhesives, and primer process	OAC rule 3745-17-07	20% opacity as a 6-minute average, except as provided by rule (stack emissions)
	OAC rule 3745-17-11	3.17 lbs/hr of particulate emissions (PE) (based on 1,362 lbs/hr maximum process weight rate)
	OAC rule 3745-21-07(G)(2)	8.0 lbs/hr of organic compounds (OC) 40.0 lbs/day of OC
	OAC rule 3745-35-07	See A.2.a through A.2.b below.

2. Additional Terms and Conditions

- (a) Combined annual emissions from this facility shall not exceed the following emission limitations, as rolling 12-month summations:

87.88 tons of volatile organic compounds (VOC);
24.11 tons of combined hazardous air pollutants (HAP); and
9.50 tons of each individual HAP.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month(s) Facility VOC Limit Facility Total HAP Limit Facility Individual HAP Limit

1	29.29 tons	8.04 tons	3.17 tons
1-2	29.29 tons	8.04 tons	3.17 tons
1-3	29.29 tons	8.04 tons	3.17 tons
1-4	29.29 tons	8.04 tons	3.17 tons
1-5	58.58 tons	16.08 tons	6.34 tons
1-6	58.58 tons	16.08 tons	6.34 tons
1-7	58.58 tons	16.08 tons	6.34 tons
1-8	58.58 tons	16.08 tons	6.34 tons
1-9	87.88 tons	24.11 tons	9.50 tons
1-10	87.88 tons	24.11 tons	9.50 tons
1-11	87.88 tons	24.11 tons	9.50 tons
1-12	87.88 tons	24.11 tons	9.50 tons

After the first 12 calendar months of operation following the issuance of this permit, compliance with the facility-wide VOC and HAP emission limitations shall be based upon rolling, 12-month summations of the combined annual emissions, in tons.

The permittee shall include all OC in the calculation of VOC emissions. The permittee has requested this condition in order to streamline the record keeping requirements.

B. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 4 to 7 inches of water while the emissions unit is in operation.
- C. Monitoring and/or Record Keeping Requirements**
1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.
 2. The permittee shall collect and record the following information for each and every day of production:
 - a. the production date and identification number of each batch produced;
 - b. the batch size, in gallons;
 - c. the batch density, in pounds per gallon;
 - d. the VOC, individual HAP, and combined HAPs contents of each batch, in weight percent;
 - e. the daily cycle time for the emissions unit, in hours;
 - f. the daily VOC, individual HAP, and combined HAPs emission rates, in pounds per day, i.e., the summation of the emissions from each batch produced that day; and
 - g. the calculated average hourly VOC emission rate for the daily production, in pounds of VOC per hour (average).

VOC, individual HAP, and combined HAPs emissions shall be calculated based upon the methodology specified in sections E.1.a, E.1.d, E.1.e and E.1.f below.
 3. For each month, the permittee shall collect and record the following information for each emissions unit at this facility:
 - a. the monthly VOC emissions, in tons;
 - b. the monthly emissions of each individual HAP, in tons; and
 - c. the monthly combined HAPs emissions, in tons.
 4. The permittee shall, on a monthly basis, calculate and record the rolling 12-month, VOC, individual HAP, and combined HAPs emission rates for all emissions units at the facility, in tons.
- D. Reporting Requirements**
1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
 2. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. an identification of each day during which the average hourly OC emissions from the daily production exceeded 8 lbs/hr, and the actual average hourly OC emissions for the daily production; and
 - b. an identification of each day during which the OC emissions exceeded 40 lbs/day, and the actual OC emissions for each such day.
 3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for VOC and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.
 4. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for each individual HAP and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.
 5. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for total combined HAPs and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.
 6. The quarterly deviation reports shall be submitted in accordance with the requirements specified in Part I-General Terms and Condition 3 of this permit.
 7. The permittee shall submit annual reports that specify the total VOC, total individual HAP, and combined HAPs emissions from the entire facility, in tons. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
- E. Testing Requirements**
1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:
Emission Limitations:

8.0 lbs/hr of OC
40.0 lbs/day of OC

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limits based upon the record keeping requirements of section C.2.

Formulation data or USEPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the OC contents of the cleanup materials, coatings and inks.

Daily and hourly VOC emissions shall be calculated in accordance with the following equations:

Daily VOC Emissions = [SUMMATION of (Size * Density * Weight Fraction * EF * (1 - CF)) for all batches produced during the day]

Where:

Daily VOC Emissions = VOC emission rate for the day's production, in pounds per day;

Size = batch size, in gallons;

Density = batch density, in pounds per gallon;

Weight Fraction = VOC content of each batch, as a weight fraction;

EF = solvent loss emission factor (AP-42, Section 6.4), 0.015; and

CF = control factor (from Control of VOC Emissions from Ink and Paint Manufacturing Processes, USEPA-450/3-92-013, Section 4.2.1.1) of 0.40, based on the use of a cover for the tank.

Hourly VOC emissions = Daily VOC Emissions / Time

Where:

Time = total daily production time, in hours.

Emission Limitation:

20% opacity as a 6-minute average, except as provided by rule (stack emissions)

Applicable Compliance Method:

OAC rule 3745-17-03(B)(1)

Emission Limitation:

3.17 lbs/hr of PE

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance by testing in accordance with Method 5, 40 CFR Part 60, Appendix A.

Emission Limitation:

87.88 tpy of VOC for entire facility, as a rolling 12-month summation

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of sections C.2 - C.4.

The monthly and rolling, 12-month VOC emissions from this emissions unit shall be calculated by summing the daily emission rates from section C.2. [All OC emissions are included in the calculation of VOC emissions.] The calculated, rolling, 12-month VOC emissions from this emissions unit shall be added to the calculated, rolling, 12-month VOC emissions from all the other emissions units at the facility to obtain the rolling, 12-month VOC emissions for the entire facility.

Emission Limitation:

9.50 tpy of each individual HAP for entire facility, as a rolling 12-month summation

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of sections C.2 - C.4.

Individual HAP emissions from this emissions unit shall be calculated in accordance with the following equation:

Individual HAP Emissions = [SUMMATION of (Size * Weight Fraction of Individual HAP * EF * (1 - CF)) for all batches produced during the day]

Where:

Individual HAP Emissions = Individual HAP emission rate for the day's production, in pounds per day;

Size = batch size, in gallons;

Density = batch density, in pounds per gallon;

Weight Fraction of Individual HAP = Individual HAP content of each batch, as a weight fraction;

EF = solvent loss emission factor (AP-42, Section 6.4), 0.015; and

CF = control factor (from Control of VOC Emissions from Ink and Paint Manufacturing Processes, USEPA-450/3-92-013, Section 4.2.1.1) of 0.40, based on the use of a cover for the tank.

The monthly and rolling, 12-month individual HAP emissions from this emissions unit shall be calculated by summing the daily emission rates from section C.2. The calculated, rolling, 12-month individual HAP emissions from this emissions unit shall be added to the calculated, rolling, 12-month individual HAP emissions from all the other emissions units at the facility to obtain the rolling, 12-month individual HAP emissions for the entire facility.
Emission Limitation:

24.11 tpy of all HAPs for entire facility, as a rolling 12-month summation

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of sections C.2 - C.4.

Combined HAPs emissions from this emissions unit shall be calculated in accordance with the following equation:

Combined HAPs Emissions = [SUMMATION of (Size * Weight Fraction of Combined HAPs * EF * (1 - CF)) for all batches produced during the day]

Where:

Combined HAPs Emissions = Combined HAPs emission rate, as a 12-month rolling summation;

Size = batch size, in gallons;

Density = batch density, in pounds per gallon;

Weight Fraction of Combined HAPs = Combined HAPs content of each batch, as a weight fraction;

EF = solvent loss emission factor (AP-42, Section 6.4), 0.015; and

CF = control factor (from Control of VOC Emissions from Ink and Paint Manufacturing Processes, USEPA-450/3-92-013, Section 4.2.1.1) of 0.40, based on the use of a cover for the tank.

The monthly and rolling, 12-month combined HAPs emissions from this emissions unit shall be calculated by summing the daily emission rates from section C.2. The calculated, rolling, 12-month combined HAPs emissions from this emissions unit shall be added to the calculated, rolling, 12-month combined HAPs emissions from all the other emissions units at the facility to obtain the rolling, 12-month combined HAPs emissions for the entire facility.

F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A, B, C, D, E, and F. The applicant has requested that such restrictions be imposed in order to limit the potential to emit for the facility and, therefore, avoid Title V applicability.

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

Facility ID: 1652050077 Emissions Unit ID: Z015 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

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>
RC #3, 1667-gallon mix vat - roof coating, adhesives, and primer process	OAC rule 3745-17-07	20% opacity as a 6-minute average, except as provided by rule (stack emissions)
	OAC rule 3745-17-11	3.17 lbs/hr of particulate emissions (PE) (based on 1,362 lbs/hr maximum process weight rate)

8.0 lbs/hr of organic compounds (OC)
40.0 lbs/day of OC

OAC rule 3745-21-07(G)(2)

See A.2.a through A.2.b below.

OAC rule 3745-35-07

2. Additional Terms and Conditions

- (a) Combined annual emissions from this facility shall not exceed the following emission limitations, as rolling 12-month summations:

87.88 tons of volatile organic compounds (VOC);
24.11 tons of combined hazardous air pollutants (HAP); and
9.50 tons of each individual HAP.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month(s)	Facility VOC Limit	Facility Total HAP Limit	Facility Individual HAP Limit
1	29.29 tons	8.04 tons	3.17 tons
1-2	29.29 tons	8.04 tons	3.17 tons
1-3	29.29 tons	8.04 tons	3.17 tons
1-4	29.29 tons	8.04 tons	3.17 tons
1-5	58.58 tons	16.08 tons	6.34 tons
1-6	58.58 tons	16.08 tons	6.34 tons
1-7	58.58 tons	16.08 tons	6.34 tons
1-8	58.58 tons	16.08 tons	6.34 tons
1-9	87.88 tons	24.11 tons	9.50 tons
1-10	87.88 tons	24.11 tons	9.50 tons
1-11	87.88 tons	24.11 tons	9.50 tons
1-12	87.88 tons	24.11 tons	9.50 tons

After the first 12 calendar months of operation following the issuance of this permit, compliance with the facility-wide VOC and HAP emission limitations shall be based upon rolling, 12-month summations of the combined annual emissions, in tons.

The permittee shall include all OC in the calculation of VOC emissions. The permittee has requested this condition in order to streamline the record keeping requirements.

B. Operational Restrictions

- 1. The pressure drop across the baghouse shall be maintained within the range of 4 to 7 inches of water while the emissions unit is in operation.

C. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.
- 2. The permittee shall collect and record the following information for each and every day of production:
 - a. the production date and identification number of each batch produced;
 - b. the batch size, in gallons;
 - c. the batch density, in pounds per gallon;
 - d. the VOC, individual HAP, and combined HAPs contents of each batch, in weight percent;
 - e. the daily cycle time for the emissions unit, in hours;
 - f. the daily VOC, individual HAP, and combined HAPs emission rates, in pounds per day, i.e., the summation of the emissions from each batch produced that day; and
 - g. the calculated average hourly VOC emission rate for the daily production, in pounds of VOC per hour (average).

VOC, individual HAP, and combined HAPs emissions shall be calculated based upon the methodology specified in sections E.1.a, E.1.d, E.1.e and E.1.f below.

- 3. For each month, the permittee shall collect and record the following information for each emissions unit at this facility:
 - a. the monthly VOC emissions, in tons;
 - b. the monthly emissions of each individual HAP, in tons; and
 - c. the monthly combined HAPs emissions, in tons.

- 4. The permittee shall, on a monthly basis, calculate and record the rolling 12-month, VOC, individual HAP, and combined HAPs emission rates for all emissions units at the facility, in tons.

D. Reporting Requirements

- 1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.

2. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. an identification of each day during which the average hourly OC emissions from the daily production exceeded 8 lbs/hr, and the actual average hourly OC emissions for the daily production; and
 - b. an identification of each day during which the OC emissions exceeded 40 lbs/day, and the actual OC emissions for each such day.
3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for VOC and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.
4. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for each individual HAP and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.
5. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for total combined HAPs and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.
6. The quarterly deviation reports shall be submitted in accordance with the requirements specified in Part I-General Terms and Condition 3 of this permit.
7. The permittee shall submit annual reports that specify the total VOC, total individual HAP, and combined HAPs emissions from the entire facility, in tons. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

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

8.0 lbs/hr of OC
40.0 lbs/day of OC

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limits based upon the record keeping requirements of section C.2.

Formulation data or USEPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the OC contents of the cleanup materials, coatings and inks.

Daily and hourly VOC emissions shall be calculated in accordance with the following equations:

Daily VOC Emissions = [SUMMATION of (Size * Density * Weight Fraction * EF * (1 - CF))] for all batches produced during the day]

Where:

Daily VOC Emissions = VOC emission rate for the day's production, in pounds per day;

Size = batch size, in gallons;

Density = batch density, in pounds per gallon;

Weight Fraction = VOC content of each batch, as a weight fraction;

EF = solvent loss emission factor (AP-42, Section 6.4), 0.015; and

CF = control factor (from Control of VOC Emissions from Ink and Paint Manufacturing Processes, USEPA-450/3-92-013, Section 4.2.1.1) of 0.40, based on the use of a cover for the tank.

Hourly VOC emissions = Daily VOC Emissions / Time

Where:

Time = total daily production time, in hours.

Emission Limitation:

20% opacity as a 6-minute average, except as provided by rule (stack emissions)

Applicable Compliance Method:

OAC rule 3745-17-03(B)(1)
Emission Limitation:

3.17 lbs/hr of PE

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance by testing in accordance with Method 5, 40 CFR Part 60, Appendix A.

Emission Limitation:

87.88 tpy of VOC for entire facility, as a rolling 12-month summation

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of sections C.2 - C.4.

The monthly and rolling, 12-month VOC emissions from this emissions unit shall be calculated by summing the daily emission rates from section C.2. [All OC emissions are included in the calculation of VOC emissions.] The calculated, rolling, 12-month VOC emissions from this emissions unit shall be added to the calculated, rolling, 12-month VOC emissions from all the other emissions units at the facility to obtain the rolling, 12-month VOC emissions for the entire facility.

Emission Limitation:

9.50 tpy of each individual HAP for entire facility, as a rolling 12-month summation

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of sections C.2 - C.4.

Individual HAP emissions from this emissions unit shall be calculated in accordance with the following equation:

Individual HAP Emissions = [SUMMATION of (Size * Weight Fraction of Individual HAP * EF * (1 - CF)) for all batches produced during the day]

Where:

Individual HAP Emissions = Individual HAP emission rate for the day's production, in pounds per day;

Size = batch size, in gallons;

Density = batch density, in pounds per gallon;

Weight Fraction of Individual HAP = Individual HAP content of each batch, as a weight fraction;

EF = solvent loss emission factor (AP-42, Section 6.4), 0.015; and

CF = control factor (from Control of VOC Emissions from Ink and Paint Manufacturing Processes, USEPA-450/3-92-013, Section 4.2.1.1) of 0.40, based on the use of a cover for the tank.

The monthly and rolling, 12-month individual HAP emissions from this emissions unit shall be calculated by summing the daily emission rates from section C.2. The calculated, rolling, 12-month individual HAP emissions from this emissions unit shall be added to the calculated, rolling, 12-month individual HAP emissions from all the other emissions units at the facility to obtain the rolling, 12-month individual HAP emissions for the entire facility.

Emission Limitation:

24.11 tpy of all HAPs for entire facility, as a rolling 12-month summation

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of sections C.2 - C.4.

Combined HAPs emissions from this emissions unit shall be calculated in accordance with the following equation:

Combined HAPs Emissions = [SUMMATION of (Size * Weight Fraction of Combined HAPs * EF * (1 - CF)) for all batches produced during the day]

Where:

Combined HAPs Emissions = Combined HAPs emission rate, as a 12-month rolling summation;

Size = batch size, in gallons;

Density = batch density, in pounds per gallon;

Weight Fraction of Combined HAPs = Combined HAPs content of each batch, as a weight fraction;

EF = solvent loss emission factor (AP-42, Section 6.4), 0.015; and

CF = control factor (from Control of VOC Emissions from Ink and Paint Manufacturing Processes, USEPA-450/3-92-013, Section 4.2.1.1) of 0.40, based on the use of a cover for the tank.

The monthly and rolling, 12-month combined HAPs emissions from this emissions unit shall be calculated by summing the daily emission rates from section C.2. The calculated, rolling, 12-month combined HAPs emissions from this emissions unit shall be added to the calculated, rolling, 12-month combined HAPs emissions from all the other emissions units at the facility to obtain the rolling, 12-month combined HAPs emissions for the entire facility.

F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A, B, C, D, E, and F. The applicant has requested that such restrictions be imposed in order to limit the potential to emit for the facility and, therefore,

avoid Title V applicability.