

Facility ID: 1677010028 Issuance type: Draft 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 P001](#)
- [Go to Part II for Emissions Unit P138](#)
- [Go to Part II for Emissions Unit R001](#)
- [Go to Part II for Emissions Unit T001](#)

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Facility ID: 1677010028 Emissions Unit ID: P001 Issuance type: Draft State Permit To Operate

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Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
1/2 hp air mixer (A4)	OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8.0 lbs/hr, and 40 lbs/day.
	OAC rule 3745-35-07	See A.2.a below. Combined annual emissions from all facility emissions units identified in section C.1 shall not exceed the following as rolling, 12-month summations: 99 tons of volatile organic compounds (VOC); 24.9 tons of all hazardous air pollutants (HAPs); and 9.9 tons of any individual HAP.
	OAC rule 3745-17-07(A)	20 percent opacity as a 6-minute average
	OAC rule 3745-17-11	Particulate emissions (PE) shall not exceed 0.551 lbs/hr.

2. **Additional Terms and Conditions**
 - (a) The applicable emission limitations based on this rule are less stringent than the limits established pursuant to OAC rule 3745-35-07 at maximum production rates. However, these limitations are still applicable as short-term limits.
The facility's emissions unit's have been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the facility-wide VOC and HAP emissions, upon issuance of this permit.
'Batch time' for this facility is defined as the hours of operation for each batch and is specifically the time from when materials enter a mixer until the materials are removed plus any cleanup time associated with that machine, i.e., process time + cleanup.

A 'batch' for the manual can washer is defined as the time it takes to clean a machine with solvent.

B. Operational Restrictions

1. Any baghouse associated with this emissions unit, or any other emissions unit at the entire facility, shall be in full operation and effectively capturing particulate emissions whenever the associated emissions unit is in operation.

C. Monitoring and/or Record Keeping Requirements

1. The record keeping and reporting requirements for the rolling, 12-month emission limitations for VOC, individual HAP, and combined HAPs shall include all of the following emissions units: 93 mixers (P001-P048, P052-P063, P067, P068, P076-P095, P114, P124-P127, P136-P138); a manual can washer (P096); 27 mills (P064-P066, P097-P113, P115-P121); 17 churns (P049-P051, P069-P075, P122, P123, P131-P135); silk-screen printing operation (R001); and 13 above-ground storage tanks (T001-T013). If additional emissions units are installed at this facility, their emissions shall be included in subsequent emissions summations.
2. The permittee shall maintain the following records on a daily basis for the mixers (except for P138), mills, churns,

silk-screen printing, and manual can washer:

- a. the product name and batch ticket number for each batch produced at the facility;
 - b. the hours of operation for each batch;
 - c. the total number of mixers, mills, churns, and manual can washer operated each day;
 - d. the volume of each batch, in gallons; and
 - e. the OC/VOC content of each batch, in pounds per gallon.
3. The permittee shall collect and record the following on a daily basis for the mixers (except for P138), mills, churns, silk-screen printing, and manual can washer:
- a. the total quantity of each OC/VOC-containing material used per day, in pounds;
 - b. the OC/VOC content of each OC/VOC-containing material used, as a weight fraction;
 - c. the mass of evaporative loss of OC/VOC from each OC/VOC-containing material used, in pounds, i.e., $(C.3.a) \times (C.3.b) \times (0.015)^*$;
 - d. the calculated daily OC/VOC emissions from all OC/VOC-containing materials, in pounds, i.e., the sum of the values recorded in C.3.c;
 - e. the total batch time for all the batches produced, in hours;
 - f. the calculated average hourly OC/VOC emission rate for each batch-hour for each unit operated during the day, i.e., $(C.3.d)/(C.3.e)$, in pounds per hour (to demonstrate that each mill, churn, mixer, and manual can washer is compliant, on average, with the hourly limit established in section A.1); and
 - g. the calculated daily OC/VOC emission rate for each unit, i.e., $(C.3.d)/(\text{the total number of units identified in C.2.c})$, in pounds per day per unit (to demonstrate that each mill, churn, mixer, and manual can washer is compliant, on average, with the daily limit established in section A.1).
- * The emission factor for batch process emissions utilized in this permit is equivalent to the 30 lbs OC/VOC/ton product emissions factor in AP-42, but integrates more readily into the permittee's emissions tracking system than the AP-42 factor. Therefore, it is used in lieu of the AP-42 factor.
4. The permittee shall collect and record the following information each month for the mixers (except for P138), mills, churns, silk-screen printing, and manual can washer:
- a. the total quantity of each HAP-containing material used per day, in pounds;
 - b. the individual HAP content of each HAP-containing material used daily, as a weight fraction;
 - c. the total, individual HAP emissions from all HAP-containing materials, in pounds (i.e., the sum of $(C.4.a) \times (C.4.b) \times (0.015)^*$ for each HAP during the month);
 - d. the total, combined HAPs emissions from all HAP-containing materials, in pounds (i.e., the sum of the individual HAP emissions from C.4.c during the month); and
 - e. the total OC/VOC emissions from all OC/VOC-containing materials, in pounds (i.e., the sum of the daily emission values recorded in C.3.d).
- Emissions in pounds may be converted to tons by multiplying by the conversion factor (1 ton/2000 pounds).
- * The emission factor for batch process emissions utilized in this permit is equivalent to the 30 lbs OC/VOC/ton product emissions factor in AP-42, but integrates more readily into the permittee's emissions tracking system than the AP-42 factor. Therefore, it is used in lieu of the AP-42 factor.
5. The permittee shall calculate and record the VOC, individual HAP, and combined HAPs emissions from all storage tanks for each month, using the latest version of USEPA's "Tanks Program" software.
6. The permittee shall calculate and record the following, for the entire facility, on a monthly basis:
- a. the total individual HAP emissions and the rolling, 12-month summation of the individual HAP emissions from this facility;
 - b. the total combined HAPs emissions and the rolling, 12-month summation of the combined HAPs emissions from this facility; and
 - c. the total OC/VOC emissions and the rolling, 12-month summation of the total OC/VOC emissions from this facility.
- These records shall be generated in accordance with sections C.2 - C.5 of these terms and conditions.
7. The permittee shall perform daily checks, when the emissions unit is in operation, for any visible particulate emissions from this emissions unit and associated baghouse, and any other emissions units with associated baghouses. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the color of the emissions
 - b. the total duration of any visible emission incident; and

- c. any corrective actions taken to eliminate the visible emissions.
8. The permittee shall maintain records whenever any emissions unit is operated, that has a potential to emit of particulate emissions, without the use of the baghouse to effectively capture the particulate emissions.
- D. Reporting Requirements**
1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following:
- the hourly OC emissions limitation (8 lbs/hr); and/or
 - the daily OC emissions limitation (40 lbs/day).
- Each deviation (excursion) report shall include a copy of the record(s) documenting the exceedance(s) and shall include a description of the corrective actions taken to prevent future exceedances.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for VOC.
3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for total combined HAPs.
4. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for individual HAP.
5. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which any particulate emitting emissions unit was in operation without the use of a baghouse.
6. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition 3 of this permit.
7. The permittee shall submit annual reports which specify the total VOC, individual HAP, and total combined HAPs emissions, in tons, from all facility emissions units for the previous calendar year. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
8. The permittee shall submit semiannual written reports which (a) identify all days during which and visible particulate emissions were observed from any particulate emitting emissions unit and it's associated baghouse and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Akron RAQMD by January 31 and July 31 of each year and shall cover the previous 6-month period.
- E. Testing Requirements**
1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:
- Emission Limitation:
- 8.0 lbs/hr of OC
40.0 lbs/day of OC
- Applicable Compliance Method:
- Compliance shall be demonstrated based upon the record keeping and reporting requirements specified in sections C.3 and D.1 of this permit. Formulation data or USEPA Method 24 shall be used to determine the OC content of the batch ingredients.
- Emission Limitation:
- 99.0 tpy of VOC for the entire facility
- Applicable Compliance Method:
- Compliance shall be demonstrated based upon the record keeping and reporting requirements specified in sections C.6 and D.2 of this permit. In order to calculate VOC emission rates, the permittee shall comply with the following:
- VOC emissions from the storage tanks shall be determined monthly using the latest version of USEPA's "Tanks Program" software.
 - VOC emissions from can washing shall be determined monthly, based upon the recorded mill wash usage. The amount of VOC lost to atmosphere through evaporation shall be assumed to be 1.5% of total mill wash VOC content employed.
 - VOC emissions from mixers, churns, mills, and similar sources shall be determined monthly by recording VOC employed through the use of batch tickets. The amount of VOC lost to atmosphere through evaporation shall be assumed to be 1.5% of the VOC content employed.
- Formulation data or USEPA Method 24 shall be used to determine the VOC content of the mill wash, tank contents, screen printing coatings, and batch ingredients.
- Emission Limitation:
- 24.9 tpy of combined HAPs for the entire facility
- Applicable Compliance Method:
- Compliance shall be demonstrated based upon the record keeping and reporting requirements specified in sections C.6 and D.3 of this permit. In order to calculate combined HAPs emission rates, the permittee shall comply with the following:

i. Combined HAPs emissions from the storage tanks shall be determined monthly using the latest version of USEPA's "Tanks Program" software.

ii. Combined HAPs emissions from can washing shall be determined monthly based upon the recorded mill wash usage. The amount of combined HAPs lost to atmosphere through evaporation shall be assumed to be 1.5% of mill wash HAPs content employed.

iii. Combined HAPs emissions from mixers, churns, mills, and similar sources shall be determined monthly by recording combined HAPs employed through the use of batch tickets. The amount of HAPs lost to atmosphere through evaporation shall be assumed to be 1.5% of HAPs content employed.

Formulation data shall be used to determine the HAP content of the mill wash, tank contents, and batch ingredients.

Emission Limitation:

9.9 tpy of any individual HAP for the entire facility

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping and reporting requirements specified in sections C.6 and D.4 of this permit. In order to calculate individual HAP emission rates, the permittee shall comply with the following:

i. Individual HAP emissions from the storage tanks shall be determined monthly using the latest version of USEPA's "Tanks Program" software.

ii. Individual HAP emissions from can washing shall be determined monthly based upon the recorded mill wash usage. The amount of individual HAP lost to atmosphere through evaporation shall be assumed to be 1.5% of mill wash HAP content employed.

iii. Individual HAP emissions from mixers, churns, mills, and similar sources shall be determined monthly by recording individual HAP employed through the use of batch tickets. The amount of HAP lost to atmosphere through evaporation shall be assumed to be 1.5% of HAP content employed.

Formulation data shall be used to determine the HAP content of the mill wash, tank contents, and batch ingredients.

Emission Limitation:

Particulate emissions (PE) shall not exceed 0.551 lbs/hr

Applicable Compliance Method:

If required, compliance with the hourly allowable PE emission limitation shall be determined based on the results of emission testing conducted in accordance with Test Methods 1 through 5 of 40 CFR Part 60, Appendix A.

Emission Limitation

The visible PE shall not exceed 20% opacity, as a 6-minute average.

Applicable Compliance Method

Compliance with the visible PE limitation above shall be demonstrated based on visible emissions evaluations conducted in accordance with OAC rule 3745-17-03(B)(1).

[No visible emission observations are specifically required to compliance with the visible PE limitations but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).]

F. Miscellaneous Requirements

1. In accordance with the provisions of OAC rule 3745-35-07, the following terms and conditions of this permit are federally enforceable: A, B, C, D, E, and F.

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Facility ID: 1677010028 Emissions Unit ID: P138 Issuance type: Draft State Permit To Operate

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Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

(a) None.

2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

(a) None.

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P138 - T49 300 gallon portable mix tank	OAC rule 3745-31-05(A)(3) (PTI 16-02440)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2). Organic compound (OC) emissions shall not exceed 8.23 lbs/hr, and 36.06 tons per year.
	OAC rule 3745-21-07(G)(2)	See B.1 below.

2. Additional Terms and Conditions

- (a) 'Batch time' for this facility is defined as the hours of operation for each batch and is specifically the time from when materials enter a mixer until the materials are removed plus any cleanup time associated with that machine, i.e., process time + cleanup.

A 'batch' for the manual can washer is defined as the time it takes to clean a machine with solvent.

B. Operational Restrictions

1. The permittee shall not employ any photochemically reactive materials as defined in OAC rule 3745-21-01(C)(5) in this emissions unit.
2. The permittee shall only employ "exempt solvents" as defined in OAC rule 3745-21-01(B)(2) in this emissions unit.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain the following records on a daily basis for this emissions unit:
 - a. the product name and batch ticket number for each batch produced at the facility;
 - b. the hours of operation for each batch;
 - c. the volume of each batch, in gallons;
 - d. the OC/VOC content of each batch, in pounds per gallon;
 - e. the calculated daily OC emissions from all batches produced, in pounds per day;
 - f. the total batch time for all the batches produced, in hours; and
 - g. the calculated average hourly OC emission rate, i.e., (C.1.e)/(C.1.f), in pounds per hour.

* The emission factor for the batch process in this permit has been developed based on the summations of material loading/unloading and surface evaporation from mixing using equations 8.4-1 and 8.4-22 from EIIP Volume II Chapter 8 Preferred and Alternative Methods of Estimating Air Emissions from Paint and Ink Manufacturing Facilities Revised August 2000. The emission factor is currently is calculated as 8.23 pounds OC per batch.

2. The permit to install for emissions units (P136 - P138) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: ethyl acetate

TLV (mg/m3): 1440
 Maximum Hourly Emission Rate (lbs/hr): 16.0
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 4762
 MAGLC (ug/m3): 34,286

Pollutant: acetone

TLV (mg/m3):1780
 Maximum Hourly Emission Rate (lbs/hr): 16.0
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 4762
 MAGLC (ug/m3): 42,381

Pollutant: methylene chloride

TLV (mg/m3):173
 Maximum Hourly Emission Rate (lbs/hr): 8.23
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 8916
 MAGLC (ug/m3): 24,810

3. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied.

Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
4. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.
5. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the average hourly total controlled organic compound emissions exceeded 8.23 pounds per hour, and the actual average hourly organic compound emissions for each such day. Each deviation (excursion) report shall include a copy of the record(s) documenting the exceedance(s) and shall include a description of the corrective actions taken to prevent future exceedances.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which non-compliant solvents were employed in this emissions unit.
3. The quarterly deviation reports shall be submitted as specified in General Term and Condition A.2 of this permit.
4. The permittee shall submit semiannual written reports which (a) identify all days during which and visible particulate emissions were observed from this emissions unit and its associated baghouse and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Akron RAQMD by January 31 and July 31 of each year and shall cover the previous 6-month period.

E. Testing Requirements

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

Organic compound (OC) emissions shall not exceed 8.23 lbs/hr, and 36.06 tons per year.

Applicable Compliance Method

Compliance with both the hourly and daily limitation shall be demonstrated through the record keeping and reporting requirements of sections C.1 and D.1 of this permit. Formulation data or USEPA Method 24 shall be used to determine the OC content of the batch ingredients.

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

F. Miscellaneous Requirements

1. None

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Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R001- Silk-Screen Printing Operation - one Daytona Squeegeizer with 0.7 mmBtu natural gas fired oven	OAC rule 3745-31-05(A)(3) (PTI #16-02200)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2). 8.0 pounds per hour organic compounds (OC) 40 pounds per day OC 7.3 tpy OC See A.2.a below.
	OAC rule 3745-21-07(G)(2) OAC rule 3745-35-07	Combined annual emissions from all facility emissions units identified in section C.5 shall not exceed the following as rolling, 12-month summations: 99 tons of volatile organic compounds (VOC); 24.9 tons of all hazardous air pollutants (HAPs); and 9.9 tons of any individual HAP.

2. Additional Terms and Conditions

- (a) The applicable emission limitations based on this rule are less stringent than the limits established pursuant to OAC rule 3745-31-05(A)(3) at maximum production rates. However, these limitations are still applicable as short-term limits.
The facility's emissions unit's have been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the facility-wide VOC and HAP emissions, upon issuance of this permit.
'Batch time' for this facility is defined as the hours of operation for each batch and is specifically the time from when materials enter a mixer until the materials are removed plus any cleanup time associated with that machine, i.e., process time + cleanup.

A 'batch' for the manual can washer is defined as the time it takes to clean a machine with solvent.

B. Operational Restrictions

1. The permittee shall only employ natural gas as a fuel in the curing oven.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain daily records of the following for each day the silk-screen equipment is in operation:
 - a. the company identification for each in and cleanup material employed;
 - b. the number of gallons of each ink and cleanup material employed;
 - c. the number of hours of operation;
 - d. the OC content of each ink and cleanup material employed;
 - e. the total OC emission rate for all inks and cleanup materials, in pounds per day; and
 - f. the average hourly OC emission rate for all inks and cleanup materials, i.e., (d)/(e), in pounds per hour (average).
2. The permit to install for this emissions unit (R001) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: xylene

TLV (mg/m3): 434
 Maximum Hourly Emission Rate (lbs/hr): 8.0
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3):585.4
 MAGLC (ug/m3): 10,333

Pollutant: naphthalene

TLV (mg/m3): 52
 Maximum Hourly Emission Rate (lbs/hr): 8.0
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3):585.4
 MAGLC (ug/m3): 1,238

Pollutant: trimethylbenzene

TLV (mg/m3): 123
 Maximum Hourly Emission Rate (lbs/hr): 8.0
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3):585.4
 MAGLC (ug/m3): 2,929

3. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.
4. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
5. The record keeping and reporting requirements for the rolling, 12-month emission limitations for VOC, individual HAP, and combined HAPs shall include all of the following emissions units: 93 mixers (P001-P048, P052-P063, P067, P068, P076-P095, P114, P124-P127, P136-P138); a manual can washer (P096); 27 mills (P064-P066, P097-P113, P115-P121); 17 churns (P049-P051, P069-P075, P122, P123, P131-P135); silk-screen printing operation (R001); and 13 above-ground storage tanks (T001-T013). If additional emissions units are installed at this facility, their emissions shall be included in subsequent emissions summations.
6. The permittee shall maintain the following records on a daily basis for the mixers (except for P138), mills, churns, silk-screen printing, and manual can washer:
 - a. the product name and batch ticket number for each batch produced at the facility;
 - b. the hours of operation for each batch;
 - c. the total number of mixers, mills, churns, and manual can washer operated each day;
 - d. the volume of each batch, in gallons; and
 - e. the OC/VOC content of each batch, in pounds per gallon.
7. The permittee shall collect and record the following on a daily basis for the mixers (except for P138), mills, churns, silk-screen printing, and manual can washer:
 - a. the total quantity of each OC/VOC-containing material used per day, in pounds;
 - b. the OC/VOC content of each OC/VOC-containing material used, as a weight fraction;
 - c. the mass of evaporative loss of OC/VOC from each OC/VOC-containing material used, in pounds, i.e., $(C.7.a) \times (C.7.b) \times (0.015)^*$;
 - d. the calculated daily OC/VOC emissions from all OC/VOC-containing materials, in pounds, i.e., the sum of the values recorded in C.7.c;
 - e. the total batch time for all the batches produced, in hours;
 - f. the calculated average hourly OC/VOC emission rate for each batch-hour for each unit operated during the

day, i.e., (C.7.d)/(C.7.e), in pounds per hour (to demonstrate that each mill, churn, mixer, and manual can washer is compliant, on average, with the hourly limit established in section A.1); and

g. the calculated daily OC/VOC emission rate for each unit, i.e., (C.7.d)/(the total number of units identified in C.6.c), in pounds per day per unit (to demonstrate that each mill, churn, mixer, and manual can washer is compliant, on average, with the daily limit established in section A.1).

* The emission factor for batch process emissions utilized in this permit is equivalent to the 30 lbs OC/VOC/ton product emissions factor in AP-42, but integrates more readily into the permittee's emissions tracking system than the AP-42 factor. Therefore, it is used in lieu of the AP-42 factor.

8. The permittee shall collect and record the following information each month for the mixers (except for P138), mills, churns, silk-screen printing, and manual can washer:
- the total quantity of each HAP-containing material used per day, in pounds;
 - the individual HAP content of each HAP-containing material used daily, as a weight fraction;
 - the total, individual HAP emissions from all HAP-containing materials, in pounds (i.e., the sum of (C.8.a)x (C.8.b)x(0.015)* for each HAP during the month);
 - the total, combined HAPs emissions from all HAP-containing materials, in pounds (i.e., the sum of the individual HAP emissions from C.8.c during the month); and
 - the total OC/VOC emissions from all OC/VOC-containing materials, in pounds (i.e., the sum of the daily emission values recorded in C.7.d).

Emissions in pounds may be converted to tons by multiplying by the conversion factor (1 ton/2000 pounds).

* The emission factor for batch process emissions utilized in this permit is equivalent to the 30 lbs OC/VOC/ton product emissions factor in AP-42, but integrates more readily into the permittee's emissions tracking system than the AP-42 factor. Therefore, it is used in lieu of the AP-42 factor.

9. The permittee shall calculate and record the VOC, individual HAP, and combined HAPs emissions from all storage tanks for each month, using the latest version of USEPA's "Tanks Program" software.
10. The permittee shall calculate and record the following, for the entire facility, on a monthly basis:
- the total individual HAP emissions and the rolling, 12-month summation of the individual HAP emissions from this facility;
 - the total combined HAPs emissions and the rolling, 12-month summation of the combined HAPs emissions from this facility; and
 - the total OC/VOC emissions and the rolling, 12-month summation of the total OC/VOC emissions from this facility.

These records shall be generated in accordance with sections C.6 - C.9 of these terms and conditions.

D. Reporting Requirements

- The permittee shall submit deviation (excursion) reports which include the following information:
 - an identification of each hour during which the controlled organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual controlled organic compound emissions for each such hour; and
 - an identification of each day during which the controlled organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual controlled organic compound emissions for each such day.
- The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for total combined HAPs.
- The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for total combined HAPs.
- The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for individual HAP.
- The deviation reports shall be submitted as specified in Part I, General Term and Condition 3 of this permit.
- The permittee shall submit annual reports which specify the total VOC, individual HAP, and total combined HAPs emissions, in tons, from all facility emissions units for the previous calendar year. 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 limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
Emission Limitation:
8.0 pounds per hour organic compounds (OC)
40 pounds per day OC
7.3 tpy OC

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of section C.1 of these T&Cs.

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 organic compound contents of the coatings and inks.
Emission Limitation:

99.0 tpy of VOC for the entire facility

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping and reporting requirements specified in sections C.10 and D.2 of this permit. In order to calculate VOC emission rates, the permittee shall comply with the following:

- i. VOC emissions from the storage tanks shall be determined monthly using the latest version of USEPA's "Tanks Program" software.
- ii. VOC emissions from can washing shall be determined monthly, based upon the recorded mill wash usage. The amount of VOC lost to atmosphere through evaporation shall be assumed to be 1.5% of total mill wash VOC content employed.
- iii. VOC emissions from mixers, churns, mills, and similar sources shall be determined monthly by recording VOC employed through the use of batch tickets. The amount of VOC lost to atmosphere through evaporation shall be assumed to be 1.5% of the VOC content employed.

Formulation data or USEPA Method 24 shall be used to determine the VOC content of the mill wash, tank contents, screen printing coatings, and batch ingredients.
Emission Limitation:

24.9 tpy of combined HAPs for the entire facility

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping and reporting requirements specified in sections C.10 and D.3 of this permit. In order to calculate combined HAPs emission rates, the permittee shall comply with the following:

- i. Combined HAPs emissions from the storage tanks shall be determined monthly using the latest version of USEPA's "Tanks Program" software.
- ii. Combined HAPs emissions from can washing shall be determined monthly based upon the recorded mill wash usage. The amount of combined HAPs lost to atmosphere through evaporation shall be assumed to be 1.5% of mill wash HAPs content employed.
- iii. Combined HAPs emissions from mixers, churns, mills, and similar sources shall be determined monthly by recording combined HAPs employed through the use of batch tickets. The amount of HAPs lost to atmosphere through evaporation shall be assumed to be 1.5% of HAPs content employed.

Formulation data shall be used to determine the HAP content of the mill wash, tank contents, and batch ingredients.
Emission Limitation:

9.9 tpy of any individual HAP for the entire facility

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping and reporting requirements specified in sections C.10 and D.4 of this permit. In order to calculate individual HAP emission rates, the permittee shall comply with the following:

- i. Individual HAP emissions from the storage tanks shall be determined monthly using the latest version of USEPA's "Tanks Program" software.
- ii. Individual HAP emissions from can washing shall be determined monthly based upon the recorded mill wash usage. The amount of individual HAP lost to atmosphere through evaporation shall be assumed to be 1.5% of mill wash HAP content employed.
- iii. Individual HAP emissions from mixers, churns, mills, and similar sources shall be determined monthly by recording individual HAP employed through the use of batch tickets. The amount of HAP lost to atmosphere through evaporation shall be assumed to be 1.5% of HAP content employed.

Formulation data shall be used to determine the HAP content of the mill wash, tank contents, and batch ingredients.

F. Miscellaneous Requirements

1. In accordance with the provisions of OAC rule 3745-35-07, the following terms and conditions of this permit are federally enforceable: A, B, C, D, E, and F.

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

Facility ID: 1677010028 Emissions Unit ID: T001 Issuance type: Draft State Permit To Operate

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Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
tank #1 : 16,640-gallon fixed roof storage tank	OAC rule 3745-21-09(L) OAC rule 3745-35-07	See A.2.c below. Combined annual emissions from all facility emissions units identified in section C.1 shall not exceed the following as rolling, 12-month summations: 99 tons of volatile organic compounds (VOC); 24.9 tons of all hazardous air pollutants (HAPs); and 9.9 tons of any individual HAP.

2. Additional Terms and Conditions

- (a) The facility's emissions unit's have been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the facility-wide VOC and HAP emissions, upon issuance of this permit.
 'Batch time' for this facility is defined as the hours of operation for each batch and is specifically the time from when materials enter a mixer until the materials are removed plus any cleanup time associated with that machine, i.e., process time + cleanup.

 A 'batch' for the manual can washer is defined as the time it takes to clean a machine with solvent. In accordance with OAC rule 3745-21-09(L)(2), this storage tank is exempt from the requirements of OAC rule 3745-21-09(L)(1) because the tank has a capacity of less than 40,000 gallons.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The record keeping and reporting requirements for the rolling, 12-month emission limitations for VOC, individual HAP, and combined HAPs shall include all of the following emissions units: 93 mixers (P001-P048, P052-P063, P067, P068, P076-P095, P114, P124-P127, P136-P138); a manual can washer (P096); 27 mills (P064-P066, P097-P113, P115-P121); 17 churns (P049-P051, P069-P075, P122, P123, P131-P135); silk-screen printing operation (R001); and 13 above-ground storage tanks (T001-T013). If additional emissions units are installed at this facility, their emissions shall be included in subsequent emissions summations.
2. The permittee shall maintain the following records on a daily basis for the mixers (except for P138), mills, churns, silk-screen printing, and manual can washer:
 - a. the product name and batch ticket number for each batch produced at the facility;
 - b. the hours of operation for each batch;
 - c. the total number of mixers, mills, churns, and manual can washer operated each day;
 - d. the volume of each batch, in gallons; and
 - e. the OC/VOC content of each batch, in pounds per gallon.
3. The permittee shall collect and record the following on a daily basis for the mixers (except for P138), mills, churns, silk-screen printing, and manual can washer:
 - a. the total quantity of each OC/VOC-containing material used per day, in pounds;
 - b. the OC/VOC content of each OC/VOC-containing material used, as a weight fraction;
 - c. the mass of evaporative loss of OC/VOC from each OC/VOC-containing material used, in pounds, i.e., (C.3.a)×(C.3.b)×(0.015)*;
 - d. the calculated daily OC/VOC emissions from all OC/VOC-containing materials, in pounds, i.e., the sum of the

values recorded in C.3.c;

- e. the total batch time for all the batches produced, in hours;
- f. the calculated average hourly OC/VOC emission rate for each batch-hour for each unit operated during the day, i.e., (C.3.d)/(C.3.e), in pounds per hour (to demonstrate that each mill, churn, mixer, and manual can washer is compliant, on average, with the hourly limit established in section A.1); and
- g. the calculated daily OC/VOC emission rate for each unit, i.e., (C.3.d)/(the total number of units identified in C.2.c), in pounds per day per unit (to demonstrate that each mill, churn, mixer, and manual can washer is compliant, on average, with the daily limit established in section A.1).

* The emission factor for batch process emissions utilized in this permit is equivalent to the 30 lbs OC/VOC/ton product emissions factor in AP-42, but integrates more readily into the permittee's emissions tracking system than the AP-42 factor. Therefore, it is used in lieu of the AP-42 factor.

- 4. The permittee shall collect and record the following information each month for the mixers (except for P138), mills, churns, silk-screen printing, and manual can washer:
 - a. the total quantity of each HAP-containing material used per day, in pounds;
 - b. the individual HAP content of each HAP-containing material used daily, as a weight fraction;
 - c. the total, individual HAP emissions from all HAP-containing materials, in pounds (i.e., the sum of (C.4.a)x (C.4.b)x(0.015)* for each HAP during the month);
 - d. the total, combined HAPs emissions from all HAP-containing materials, in pounds (i.e., the sum of the individual HAP emissions from C.4.c during the month); and
 - e. the total OC/VOC emissions from all OC/VOC-containing materials, in pounds (i.e., the sum of the daily emission values recorded in C.3.d).

Emissions in pounds may be converted to tons by multiplying by the conversion factor (1 ton/2000 pounds).

* The emission factor for batch process emissions utilized in this permit is equivalent to the 30 lbs OC/VOC/ton product emissions factor in AP-42, but integrates more readily into the permittee's emissions tracking system than the AP-42 factor. Therefore, it is used in lieu of the AP-42 factor.

- 5. The permittee shall calculate and record the VOC, individual HAP, and combined HAPs emissions from all storage tanks for each month, using the latest version of USEPA's "Tanks Program" software.
- 6. The permittee shall calculate and record the following, for the entire facility, on a monthly basis:
 - a. the total individual HAP emissions and the rolling, 12-month summation of the individual HAP emissions from this facility;
 - b. the total combined HAPs emissions and the rolling, 12-month summation of the combined HAPs emissions from this facility; and
 - c. the total OC/VOC emissions and the rolling, 12-month summation of the total OC/VOC emissions from this facility.

These records shall be generated in accordance with sections C.2 - C.5 of these terms and conditions.

D. Reporting Requirements

- 1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for VOC.
- 2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for total combined HAPs.
- 3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for individual HAP.
- 4. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition 3 of this permit.
- 5. The permittee shall submit annual reports which specify the total VOC, individual HAP, and total combined HAPs emissions, in tons, from all facility emissions units for the previous calendar year. 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.1.1 of these terms and conditions shall be determined in accordance with the following methods:
Emission Limitation:

99.0 tpy of VOC for the entire facility

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping and reporting requirements specified in sections C.6 and D.1 of this permit. In order to calculate VOC emission rates, the permittee shall comply with the following:

i. VOC emissions from the storage tanks shall be determined monthly using latest version of USEPA's "Tanks Program" software.

ii. VOC emissions from can washing shall be determined monthly, based upon the recorded mill wash usage. The amount of VOC lost to atmosphere through evaporation shall be assumed to be 1.5% of total mill wash VOC content employed.

iii. VOC emissions from mixers, churns, mills, and similar sources shall be determined monthly by recording VOC employed through the use of batch tickets. The amount of VOC lost to atmosphere through evaporation shall be assumed to be 1.5% of the VOC content employed.

Formulation data or USEPA Method 24 shall be used to determine the VOC content of the mill wash, tank contents, screen printing coatings, and batch ingredients.

Emission Limitation:

24.9 tpy of combined HAPs for the entire facility

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping and reporting requirements specified in sections C.6 and D.2 of this permit. In order to calculate combined HAPs emission rates, the permittee shall comply with the following:

i. Combined HAPs emissions from the storage tanks shall be determined monthly using the latest version of USEPA's "Tanks Program" software.

ii. Combined HAPs emissions from can washing shall be determined monthly based upon the recorded mill wash usage. The amount of combined HAPs lost to atmosphere through evaporation shall be assumed to be 1.5% of mill wash HAPs content employed.

iii. Combined HAPs emissions from mixers, churns, mills, and similar sources shall be determined monthly by recording combined HAPs employed through the use of batch tickets. The amount of HAPs lost to atmosphere through evaporation shall be assumed to be 1.5% of HAPs content employed.

Formulation data shall be used to determine the HAP content of the mill wash, tank contents, screen printing coatings, and batch ingredients.

Emission Limitation:

9.9 tpy of any individual HAP for the entire facility

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping and reporting requirements specified in sections C.6 and D.3 of this permit. In order to calculate individual HAP emission rates, the permittee shall comply with the following:

i. Individual HAP emissions from the storage tanks shall be determined monthly using the latest version of USEPA's "Tanks Program" software.

ii. Individual HAP emissions from can washing shall be determined monthly based upon the recorded mill wash usage. The amount of individual HAP lost to atmosphere through evaporation shall be assumed to be 1.5% of mill wash HAP content employed.

iii. Individual HAP emissions from mixers, churns, mills, and similar sources shall be determined monthly by recording individual HAP employed through the use of batch tickets. The amount of HAP lost to atmosphere through evaporation shall be assumed to be 1.5% of HAP content employed.

Formulation data shall be used to determine the HAP content of the mill wash, tank contents, screen printing coatings, and batch ingredients.

F. Miscellaneous Requirements

1. In accordance with the provisions of OAC rule 3745-35-07, the following terms and conditions of this permit are federally enforceable: A, B, C, D, E, and F.