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Facility Name: **16-1758**

Application Number: **Plasti-Kote Company, Inc**

Date: **November 10, 1999**

GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCES

The proposed source(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of Ohio Administrative Code (OAC) Rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as

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an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

PUBLIC DISCLOSURE

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC Rule 3745-49-03.

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APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

BEST AVAILABLE TECHNOLOGY

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws and regulations.

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Plasti-Kote Company Inc** located in **Medina** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

Ohio EPA Source <u>Number</u> P011	P013			Source Identification <u>Description</u>
P009				Paint Mixing Station #1
			P016	
	P014			
	P012			
P010				Paint Mixing Station #2
			P017	
	P015			

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
	#4			minimize OC emissions.
Paint Mixing Station #3	Paint Mixing Station #9	Paint Mixing Station #14	<u>BAT Determination</u> Compliance with the Air Toxics Policy. The permittee shall employ a cover to reduce solvent evaporation losses. When filling the mixing vessel, the permittee shall employ methods to minimize OC emissions.	Compliance with the Air Toxics Policy. The permittee shall employ a cover to reduce solvent evaporation losses. When filling the mixing vessel, the permittee shall employ methods to minimize OC emissions.
Paint Mixing Station #7	Paint Mixing Station #12		Compliance with the Air Toxics Policy. The permittee shall employ a cover to reduce solvent evaporation losses. When filling the mixing vessel, the permittee shall employ methods to minimize OC emissions.	Compliance with the Air Toxics Policy. The permittee shall employ a cover to reduce solvent evaporation losses. When filling the mixing vessel, the permittee shall employ methods to minimize OC emissions.
Paint Mixing Station	Paint Mixing Station #13		Compliance with the Air Toxics Policy. The permittee shall employ methods to	Compliance with

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the Air Toxics Policy. The permittee shall employ a cover to reduce solvent evaporation losses. When filling the mixing vessel, the permittee shall employ methods to minimize OC emissions. Compliance with the Air Toxics Policy.	The permittee shall employ a cover to reduce solvent evaporation losses. When filling the mixing vessel, the permittee shall employ methods to minimize OC emissions. Compliance with the Air Toxics Policy. The permittee shall employ a cover to reduce solvent evaporation losses. When filling the mixing vessel, the permittee shall employ methods to minimize OC emissions.	Air Toxics Policy. The permittee shall employ a cover to reduce solvent evaporation losses. When filling the mixing vessel, the permittee shall employ methods to minimize OC emissions. Compliance with the Air Toxics Policy. The permittee shall employ a cover to reduce solvent evaporation losses. When filling the mixing vessel, the permittee shall employ methods to minimize OC emissions.	Applicable Federal & OAC Rules 3745-31-05 (A) (3) 3745-21-07 (G) (2) 3745-31-05 (A) (3) 3745-21-07 (G) (2) 3745-31-05 (A) (3) 3745-21-07 (G) (2) 3745-31-05 (A) (3) 3745-21-07 (G) (2)	3) 3745-21-07 (G) (2) 3745-31-05 (A) (3) 3745-21-07 (G) (2) 3745-31-05 (A) (3) 3745-21-07 (G) (2) 3745-31-05 (A) (3) 3745-21-07 (G) (2)

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
3745-21-07(G) (2)		Permit Allowable Mass Emissions and/or Control/Usage Requirements	7.3 TPY OC	7.3 TPY OC
	3745-31-05(A) (3)	7.3 TPY organic compounds (OC)	8.0 lbs/hr OC and 40 lbs/day OC	8.0 lbs/hr OC and 40 lbs/day OC
	3745-21-07(G) (2)	8.0 lbs/hr OC and 40 lbs/day OC		
3745-31-05(A) (3)			7.3 TPY OC	7.3 TPY OC
3745-21-07(G) (2)		7.3 TPY OC	8.0 lbs/hr OC and 40 lbs/day OC	8.0 lbs/hr OC and 40 lbs/day OC
		8.0 lbs/hr OC and 40 lbs/day OC		
			7.3 TPY OC	7.3 TPY OC
3745-31-05(A) (3)		7.3 TPY OC	8.0 lbs/hr OC and 40 lbs/day OC	8.0 lbs/hr OC and 40 lbs/day OC
		8.0 lbs/hr OC and 40 lbs/day OC		
3745-21-07(G) (2)				

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SUMMARY
 TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
OC	65.7

WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **Akron Air Pollution Control, 146 South High Street, Room 904, Akron, OH 44308.**

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

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The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

CONSTRUCTION COMPLIANCE CERTIFICATION

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

P009, P010, P011, P012, P013, P014, P015, P016, and P017

A. Additional Terms and Conditions

1. The emission limitation specified by OAC rule 3745-21-07(G)(2) is equivalent to the limit established pursuant to OAC rule 3745-31-05(A)(3).
2. Note that acetone and methylene chloride have been determined to be not photochemically reactive and therefore are not included in the emission limitations established under OAC rule 3745-21-07 and OAC rule 3745-31-05.

B. Operational Restrictions

None.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each change where air toxic modeling was required pursuant to the Air Toxic Policy:
 - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters,

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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 preformed, a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.
2. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

D. Reporting Requirements

None.

E. Testing Requirements

1. Compliance with the emission limitations in Emission Summary of this permit shall be determined in accordance with the following method(s):

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a. Emission Limitation

8 lbs/hr OC, 40 lbs/day OC, and 7.3 TPY OC

Applicable Compliance Method

Based on the "worst-case" scenario and using EIIP Preferred and Alternative Methods for Estimating Air Emissions Volume II, Chapter 8, Section 4, the annual, daily, and hourly OC emission limits are not exceeded. Therefore, no recordkeeping, deviation reporting, or emissions calculations are required to demonstrate compliance with these limits.

F. Miscellaneous Requirements

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worse case" pollutant(s):

Pollutant: acetone

TLV (mg/m3): 1188

Maximum Hourly Emission Rate (lbs/hr): 15.64

Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 13240

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MAGLC (ug/m3): 28285.7

Pollutant: toluene

TLV (mg/m3): 188

Maximum Hourly Emission Rate (lbs/hr): 0.81

Predicted 1 Hour Maximum Ground-Level Concentration
(ug/m3): 642.4

MAGLC (ug/m3): 4476.19

Pollutant: methyl ethyl ketone

TLV (mg/m3): 590

Maximum Hourly Emission Rate (lbs/hr): 1.97

Predicted 1 Hour Maximum Ground-Level Concentration
(ug/m3): 1593

MAGLC (ug/m3): 14047.6

Pollutant: cyclohexane

TLV (mg/m3): 1030

Maximum Hourly Emission Rate (lbs/hr): 0.73

Predicted 1 Hour Maximum Ground-Level Concentration
(ug/m3): 878.1

MAGLC (ug/m3): 24523.8

Pollutant: methanol

TLV (mg/m3): 262

Maximum Hourly Emission Rate (lbs/hr): 0.66

Predicted 1 Hour Maximum Ground-Level Concentration
(ug/m3): 1083

MAGLC (ug/m3): 6238.1

Pollutant: isopropyl alcohol

TLV (mg/m3): 983

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Maximum Hourly Emission Rate (lbs/hr): 0.36

Predicted 1 Hour Maximum Ground-Level Concentration
(ug/m3): 481.2

MAGLC (ug/m3): 23404.76

Pollutant: methyl methacrylate

TLV (mg/m3): 410

Maximum Hourly Emission Rate (lbs/hr): 0.29

Predicted 1 Hour Maximum Ground-Level Concentration
(ug/m3): 336.8

MAGLC (ug/m3): 9761.9

Physical changes or changes in the method of operation of the emissions unit that result in changes to the factors affecting the air toxic analysis could result in noncompliance with this permit to install. In order to avoid this noncompliance situation, prior to initiating any changes, permittees are required to conduct an evaluation to determine that the "Air Toxic Policy" is still satisfied. Changes that can affect the "Air Toxic Policy" include, but are not limited to, 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,

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- 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.).

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and,
- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.