



State of Ohio Environmental Protection Agency

STREET ADDRESS:

Lazarus Government Center
50 W. Town St., Suite 700
Columbus, Ohio 43215

TELE: (614) 644-3020 FAX: (614) 644-3184
www.epa.state.oh.us

MAILING ADDRESS:

P.O. Box 1049
Columbus, OH 43216-1049

3/16/2009

Lorie Webb
Aexcel Corporation
7373 Production Drive
Mentor, OH 44060

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0243081231
Permit Number: P0104058
Permit Type: Initial Installation
County: Lake

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR
No	CEMS
No	MACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, Lake County News-Herald. A copy of the public notice and the draft permit are enclosed. This permit has been posted to the Division of Air Pollution Control Web page <http://www.epa.state.oh.us/dapc> in Microsoft Word and Adobe Acrobat format. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
Columbus, Ohio 43215

and Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 43087

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install and operate will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install and Operate is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)425-9171.

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
Ohio EPA-NEDO; Pennsylvania; Canada

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

Aexcel Corp.
Permit P0104058
Facility ID No. 02 43 08 1231

Permit Strategy Write-up for Emissions Unit P011

Aexcel Corp is a manufacturer of coatings; traffic paint, parking lot marking paint and OEM industrial coatings, both water-based and solvent based formulations. The plant is located at 7373 Production Dr., Mentor, OH, in Lake County.

The facility status has been that of a synthetic minor to avoid major source status and the Title V Permit Program. On March 11, 2004, Ohio EPA issued FEPTOs for emissions unit P001, P002 and P004-P010. Each emissions unit is a paint disperser/mixer, including let-down (thinning) tanks and filling station. The permits had individual OC emissions limit for each tank and facilitywide limits on each single HAP and total combined HAPs.

This FEPTIO is for disperser D-12 (P011) which will replace disperser D-10 (P010), which was permanently taken out of service on 12/01/2008, as it was worn out. The applicant has requested a FEPTIO to limit emissions as follows:

- (a) OC emissions – limited to 9.9 tons per rolling 12-month period.
- (b) Single HAP emissions, excluding methanol – from P001, P002, P004-P009 and P011 will be limited to 9.03 tons per rolling 12-month period.
- (c) Methanol emissions-limited to 6.01 from P001, P002, P004-P009 and P011 will be limited to 9.03 tons per rolling 12-month period.
- (d) Combined HAPs from P001, P002, P004-P009 and P011 will be limited to 19.14 tons per rolling 12-month period. The HAPs limits allow the facility to avoid the requirements of MACT rule Subpart HHHHH for Misc. Coatings Manufacture.

The facility has emissions data from the previous year and will be able to calculate the rolling 12-month emissions rates required after the first month of operation for this new emissions unit which is a replacement for P010.

For calendar year 2008 the facilitywide OC emissions were 7.74 tons, the combined HAPs emissions were 5.01 tons and the largest single HAP emitted was toluene at 3.13 tons.

Conclusions: Aexcel Corp. has been officially a synthetic minor facility for 6 years, and the installation of this emissions unit, which replaces a retired emissions unit, will not cause the company status to change and the issuance of an FEPTIO is recommended.

Prepared By: Ken Djukic
DAPC-NEDO
Feb 13, 2009

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install and Operate
Aexcel Corporation

Issue Date: 3/16/2009
Permit Number: P0104058
Permit Type: Initial Installation
Permit Description: P011 - Mixer D12 for solvent-based coatings. (This emissions unit was previously a
deminimis source used to mix only water-based coatings.)
Facility ID: 0243081231
Facility Location: Aexcel Corporation
7373 Production Drive,
Mentor, OH 44060
Facility Description: Paint and Coating Manufacturing

Chris Korleski, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio has issued a draft action of an air pollution control, federally enforceable permit-to-install and operate (PTIO) for the facility at the location identified above on the date indicated. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Kenneth Djukic at Ohio EPA DAPC, Northeast District Office, 2110 East Aurora Road or (330)425-9171. The permit can be downloaded from the Web page: www.epa.state.oh.us/dapc



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

DRAFT

**Air Pollution Permit-to-Install and Operate
for
Aexcel Corporation**

Facility ID: 0243081231
Permit Number: P0104058
Permit Type: Initial Installation
Issued: 3/16/2009
Effective: To be entered upon final issuance
Expiration: To be entered upon final issuance



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Air Pollution Permit-to-Install and Operate
for
Aexcel Corporation

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State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0104058

Facility ID: 0243081231

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0243081231

Application Number(s): A0036226

Permit Number: P0104058

Permit Description: P011 - Mixer D12 for solvent-based coatings. (This emissions unit was previously a de minimis source used to mix only water-based coatings.)

Permit Type: Initial Installation

Permit Fee: \$200.00 *DO NOT send payment at this time - subject to change before final issuance*

Issue Date: 3/16/2009

Effective Date: To be entered upon final issuance

Expiration Date: To be entered upon final issuance

Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

Aexcel Corporation
7373 Production Drive
Mentor, OH 44060

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 43087
(330)425-9171

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and Federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0104058

Facility ID: 0243081231

Effective Date: To be entered upon final issuance

Authorization (continued)

Permit Number: P0104058

Permit Description: P011 - Mixer D12 for solvent-based coatings. (This emissions unit was previously a de minimis source used to mix only water-based coatings.)

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

Emissions Unit ID:	P011
Company Equipment ID:	D012
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0104058

Facility ID: 0243081231

Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions



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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

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



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

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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

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

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



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0104058

Facility ID: 0243081231

Effective Date: To be entered upon final issuance

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

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

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

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



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

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B. Facility-Wide Terms and Conditions



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0104058

Facility ID: 0243081231

Effective Date: To be entered upon final issuance

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0104058

Facility ID: 0243081231

Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. P011, D012

Operations, Property and/or Equipment Description:

Disperser System D-12, used to mix, thin and fill shipping containers of solvent-based coatings. (This emissions unit was previously used to mix water-based coatings and was then listed as a permit exempt, de minimis source.)

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)(1)(b)	Organic compound (OC) emissions shall not exceed 9.9 tons per rolling, 12-month period. This limit is established to limit facility-wide emissions to less than major source status. See b)(2)a, b)(2)b and b)(2)c below for facility-wide emission limitations on Hazardous Air Pollutants (HAPs).
b.	OAC rule 3745-31-05(A)(3)	The requirement of this rule to employ Best Available Technology (BAT) is not applicable as the annual emission of OC will be limited to less than 10 tpy by this permit, see above.
c.	OAC rule 3745-21-07(G)(2)	Not applicable, see b)(2)d below.
d.	40 CFR Part 63, Subpart HHHHH	Not applicable. In accordance with OAC rule 3745-31-05(D)(1)(b), this permit contains synthetic minor emission limitations on HAPs to avoid MACT rule



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		requirements.

(2) Additional Terms and Conditions

- a. The emission of methanol from emissions units P001, P002, P004 through P009 and P011, combined, shall not exceed 6.01 tons per rolling, 12-month period, based upon a rolling, 12-month summation of the monthly emissions. Emissions units P001, P002 and P004 through P009 have been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, methanol summation of the emissions, upon issuance of this permit.
- b. The emission of each individual HAP, excluding methanol, from emissions units P001, P002, P004 through P009 and P011, combined, shall not exceed 9.03 tons per rolling, 12-month period, based upon a rolling, 12-month summation of the monthly emissions. Emissions units P001, P002 and P004 through P009 have been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, individual HAP summation of the emissions, upon issuance of this permit.
- c. The emissions of the total combined HAPs from emissions units P001, P002, P004 through P009 and P011, combined, shall not exceed 19.14 tons per rolling, 12-month period, based upon a rolling, 12-month summation of the monthly emissions. Emissions units P001, P002 and P004 through P009 have been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, total combined HAPs summation of the emissions, upon issuance of this permit.
- d. OAC rule 3745-21-07(G)(2) does not apply because the emissions unit is not involved in "employing, applying, evaporating or drying" photochemically reactive material (Ohio Supreme Court's decision in Ashland Chemical Company vs. Jones (2001), 92 Ohio St. 3d 234).

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of OC usage sufficient to determine the monthly OC emissions and the OC emissions for the rolling, 12-month period. These records shall include the following information:
 - a. the name or identification of each solvent used in this emissions unit;
 - b. the amount of each solvent used (WS) in this emissions unit, in pounds per month (the WS shall include the initial virgin solvent loaded, any solvent in resin mixtures added, additions to off-spec batches and the recovered solvent from cleanup of other batches);



- c. the total amount of solvent usage (TWS), in pounds per month (TWS is to be calculated by summing the amounts of all solvents used, in pounds, during the past month);
 - d. a calculation of the monthly OC emissions (MOC), in pounds (the MOC shall be calculated by multiplying the TWS by the facility-wide emission factor (EF), which is a ratio of the pound of OC emitted per pound of solvent used); and
 - e. a calculation of the rolling, 12-month summation of OC emissions.
- (2) The permittee shall maintain monthly records of individual and total combined HAPs usage for this emissions unit and for emissions units P001, P002, P004 through P009 and P011, combined, sufficient to determine the monthly HAPs emissions and the HAPs emissions for the rolling, 12-month period. These records shall include the following information:
- a. the name or identification of each HAP used;
 - b. the amount of each individual HAP used (MH), in pounds per month; and
 - c. the monthly emissions of each individual HAP, 'IHAP', in pounds per month. The IHAP shall be calculated by using the following equation:
$$\text{IHAP} = (\text{MH}/\text{TWS}) * \text{MOC} \text{ (or equivalently } \text{IHAP} = \text{MH} * \text{EF})$$
- (3) Calculate the following rolling, 12-month summations, in tons, for this emissions unit and for emissions units P001, P002, P004 through P009 and P011, combined:
- a. the emissions of each individual HAP; and
 - b. the emissions of total combined HAPs.
- (4) The permittee shall calculate and maintain monthly records of the OC emissions and the rolling, 12-month emissions of OC from this emissions unit.
- (5) The permittee shall calculate and maintain monthly records of the methanol emissions and the rolling, 12-month emissions of methanol from emissions units P001, P002, P004 through P009 and P011, combined.
- (6) The permittee shall calculate and maintain monthly records of the emissions of each individual HAP and the rolling, 12-month emissions of each individual HAP from emissions units P001, P002, P004 through P009 and P011, combined.
- (7) The permittee shall calculate and maintain monthly records of the total combined HAPs emissions and the rolling, 12-month emissions of total combined HAPs from emissions units P001, P002, P004 through P009 and P011, combined.
- e) Reporting Requirements
- (1) The permittee shall submit deviation reports that include the following information:
- a. any exceedance of the rolling, 12-month emission limitation for OC;



- b. any exceedance of the rolling, 12-month emission limitation for any individual HAP from emissions units P001, P002, P004 through P009 and P011, combined; and
 - c. any exceedance of the rolling, 12-month emission limitation for total combined HAPs from emissions units P001, P002, P004 through P009 and P011, combined.
 - (2) All deviation reports shall be submitted in accordance with the requirements specified in the Standard Terms and Conditions of this permit.
 - (3) The permittee shall submit an annual report that summarizes the emissions of OC, each individual HAP, and total combined HAPs from emissions units P001, P002, P004 through P009 and P011, combined. The reports shall include the emissions calculations and shall be submitted by Feb, 15th of each year and shall cover the previous calendar year.
 - (4) The permittee shall also submit annual reports that summarize the facility-wide emission factor determination, as specified in g)(1) below. The reports shall be submitted by Feb. 15th of each year and shall cover the previous calendar year.
 - (5) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- f) **Testing Requirements**
 - (1) Compliance with the allowable emission limitations in b)(1) and b)(2) of these terms and conditions shall be determined in accordance with the following methods:
 - a. **Emission Limitation:**

OC emissions shall not exceed 9.9 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1) and d)(4).
 - b. **Emission Limitation:**

The emission of methanol from emissions units P001, P002, P004 through P009 and P011, combined, shall not exceed 6.01 tons per rolling, 12-month period, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(2), d)(3) and d)(5).



c. Emission Limitation:

The emission of each individual HAP, excluding methanol, from emissions units P001, P002, P004 through P009 and P011, combined, shall not exceed 9.03 tons per rolling, 12-month period, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(2), d)(3) and d)(6).

d. Emission Limitation:

The emissions of the total combined HAPs from emissions units P001, P002, P004 through P009 and P011, combined, shall not exceed 19.14 tons per rolling, 12-month period, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(2), d)(3) and d)(7).

g) Miscellaneous Requirements

- (1) The permittee shall calculate a facility-wide emission factor each year for OC. The emission factor shall be calculated by Feb 15th of each year and shall be based upon solvent usage records (material balance) for the previous calendar year of operation.