

**Synthetic Minor Determination and/or**  **Netting Determination**

Permit To Install **01-08727**

**A. Source Description**

Akzo Nobel Coatings, located in Columbus, has submitted a Permit to Install (PTI) application for a Plastisol coating manufacturing operation that involves the proposed installation of 10 new emissions units. This PTI includes proposed federally enforceable limits in order to effectively restrict the affected facility's Potential To Emit (PTE) below those levels which trigger Title V permitting requirements. This proposed synthetic minor PTI is specific to those emission units associated with the plastisol coating manufacturing area.

**B. Facility Emissions / Attainment Status**

Akzo Nobel Coatings currently has the potential to emit (PTE) less than the Title V thresholds. When evaluating Title V applicability, the Ohio EPA has included the potential emissions from AKZO's resin plant and coil coatings manufacturing operation, which are both part of the same facility

Franklin County is currently designated attainment for the National Ambient Air Quality Standard (NAAQS) for all criteria pollutants.

**C. Source Emissions**

Without federally enforceable emission limitations, the proposed plastisol coating manufacturing operations has a PTE in excess of 3.33 tons of OC/year, based on 8,760 hours per year of operation.

The facility and Ohio EPA have agreed to production restrictions (975,000 gallons of plastisol coating), and the use of emissions factors (verified through onsite emissions testing) in the PTI for the proposed plastisol coating manufacturing operations which corresponds to a maximum annual OC emissions of 0.11 tons OC/year.

When combined with the federally enforceable emission limitations (6.71 TPY VOC, 6.71 TPY Total HAP and 2.82 TPY individual HAP) contained in AKZO's FESOP for the resin plant and (14.61 tons OC/year, 14.61 tons of total HAP and 6.14 tons of any individual HAP) contained in AKZO's synthetic minor PTI for the coil coatings manufacturing operation, Akzo's facility wide PTE will total (21.43 tons VOC, 9.07 tons of any single HAP and 21.43 tons of total HAPS). These levels are below those levels which trigger Title V permitting requirements.

**D. Conclusion**

The operation of the proposed plastisol coating manufacturing operations in accordance with the terms and conditions of the PTI, will result in maximum emissions from the plastisol coating manufacturing operations of 0.11 tons OC/year.

Moreover, additional limitations on emissions, when combined with the resin plant's FESOP emission limitations and the synthetic minor PTI for the coil coatings manufacturing operation, will result in facility wide emissions falling below those levels which trigger Title V permitting requirements.

The PTI includes federally enforceable limits, monitoring, recordkeeping and reporting to ensure continued compliance with the PTI's requirements.



**RE: DRAFT PERMIT TO INSTALL  
FRANKLIN COUNTY  
Application No:**

**CERTIFIED MAIL**

**01-08727**

**DATE: 6/10/2003**

Akzo Nobel Coatings Inc  
Steve Salsbury  
1313 Windsor Avenue  
Columbus, OH 43216-0489

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on 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 public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$2000** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

A handwritten signature in cursive script that reads "Michael W. Ahern".

Michael W. Ahern, Supervisor  
Field Operations and Permit Section  
Division of Air Pollution Control

CC: USEPA

CDO

Mid-Ohio Regional Planning Commission

**FRANKLIN COUNTY**

**PUBLIC NOTICE**

**ISSUANCE OF DRAFT ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 01-08727**

On 6/10/2003 the Director of the Ohio Environmental Protection Agency issued a draft action of an administrative modification of a prior Permit To Install document for an air contaminant source for **Akzo Nobel Coatings Inc**, located at **1313 Windsor Avenue, Columbus, Ohio**.

The administrative modification shall become effective upon final issuance.

**Premix tank holding tank portable tanks mixing station hockmeyer tank washer II versator deaerators 3 vortisiv filtration units 3.**

Comments concerning this draft action, or a request for a public hearing, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Isaac Robinson, Ohio EPA, Central District Office, 3232 Alum Creek Drive, Columbus, OH 43207-3417  
[(614)728-3778]



**Permit To Install  
Terms and Conditions**

**Issue Date: To be entered upon final issuance  
Effective Date: To be entered upon final issuance**

**DRAFT PERMIT TO INSTALL 01-08727**

Application Number: 01-08727  
APS Premise Number: 0125040064  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: Akzo Nobel Coatings Inc  
Person to Contact: Steve Salsbury  
Address: 1313 Windsor Avenue  
Columbus, OH 43216-0489

Location of proposed air contaminant source(s) [emissions unit(s)]:

**1313 Windsor Avenue  
Columbus, Ohio**

Description of proposed emissions unit(s):

**Premix tank holding tank portable tanks mixing station hockmeyer tank washer II versator deaerators 3 vortisiv filtration units 3.**

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable. This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

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Director

**Part I - GENERAL TERMS AND CONDITIONS**

**A. Permit to Install General Terms and Conditions**

**1. Compliance Requirements**

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

**2. Reporting Requirements**

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

**3. Records Retention Requirements**

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.

**4. Inspections and Information Requests**

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any

**Issued: To be entered upon final issuance**

information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

**5. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

**6. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

**7. Air Pollution Nuisance**

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

**8. Termination of Permit to Install**

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. 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.

**9. Construction of New Sources(s)**

The proposed emissions unit(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

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laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(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 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 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 the requirements of this permit or cannot meet applicable standards.

**10. 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.

**11. Applicability**

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

**12. 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.

**13. Source Operation and Operating Permit Requirements After Completion of Construction**

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

**14. 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.

**15. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

**B. Permit to Install Summary of Allowable Emissions**

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)  
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	0.11
PM	0.49

**Akzo Nobel Coatings Inc**  
**PTI Application 01-00737**  
**Issue**

**Facility ID: 0125040064**

**Emissions Unit ID: P336**

Akzo

PTI

Emissions Unit ID: P336

Issued: To be entered upon final issuance

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

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

1. The specific operations(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 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>
P336 - Premix tank(PM-211) with a bag dump controlled by a baghouse and a thermal oxidizer	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) shall not exceed 1.01 pounds per hour and 0.42 ton per year.  Organic compound (OC) emissions shall not exceed 0.001 ton per year.  Compliance with this rule also includes compliance with the requirements of OAC rules 3745-21-07(G)(2), 3745-17-07(A)(1), and 3745-35-07(B).
	OAC rule 3745-21-07(G)(2)	OC emissions shall not exceed 8 pounds per hour and 40 pounds per day.
	OAC rule 3745-17-11(B)(1)	The PE specified by this rule is less stringent than the PE established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)(1)	Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.  OC*emissions from this emissions unit shall not exceed 0.001 ton/year and from emissions unit P337 shall not exceed 0.002 ton/year, as a rolling, 12-month summation.
	OAC rule 3745-35-07(B)	

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See A.2.a, B.1, B.2 and C.1  
thru C.3.

\*Assume all HAP and VOC  
emissions are OC emissions.

Emissions Unit ID: **P336**

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## 2. Additional Terms and Conditions

- 2.a** The thermal incinerator controlling OC emissions from this emissions unit shall operate with a minimum control efficiency of 97.55%, by weight, for OC emissions.
- 2.b** The baghouse controlling particulate emissions from this emissions unit shall operate with a grain loading of less than 0.05 grains per dry standard cubic foot.
- 2.c** The emissions from the Plastisol Large Batch Production Area, Premix Tank and Holding Tank, (emissions units P336 and P337) shall not exceed the following:

Organic Compounds (OC) from Premix Tank	0.001 ton/year
Organic Compounds (OC) from Holding Tank	0.002 ton/year
Particulate Matter (PM) from Premix Tank	0.42 ton/year

## B. Operational Restrictions

1. The maximum rolling twelve (12) month coatings production rate for the Plastisol Large Batch Production Area (emissions units P336 and P337) shall be limited to 843,000 gallons. The production emissions will be assigned to the day the coating is drained from the holding tank (corresponds to filling report). In order to ensure federal enforce ability, for the first twelve calendar months of operation, this facility shall not exceed the following coatings production rate limits for the specific time period:

<u>Month</u>	<u>Total Throughput (gallons)</u>
1	56,000
1-2	125,000
1-3	203,000
1-4	281,000
1-5	359,000
1-6	441,000
1-7	523,000
1-8	605,000
1-9	674,000
1-10	730,000
1-11	786,000
1-12	843,000

After the first 12 calendar months of operation following the issuance of this permit, compliance

**Akzo Nobel Coatings Inc**  
**PTI Application 01-00707**  
**Issue**

**Facility ID: 0125040064**

Emissions Unit ID: **P336**

with the annual throughput limitation shall be based upon a rolling, 12-month summation of the throughput.

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2. The average temperature of the exhaust gases from the thermal incinerator, for any 3-hour block of time, shall not be less than 1350°F.
3. 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 said equipment, must be accompanied by the shutdown of the associated air pollution source(s).
4. The pressure drop across the baghouse controlling emissions from this emissions unit shall be maintained within the range of 1.5 to 5 inches of water while this emissions unit is in operation.

**C. Monitoring and/or Recordkeeping Requirements**

1. This facility shall maintain daily records which list the following information for products produced in the Plastisol Large Batch Production Area (emissions units P336 and P337):
  - a. the number of gallons of product produced in the Plastisol Large Batch Production Area;
  - b. the number of gallons of product produced in each emissions unit;
  - c. the total hours of daily operation of each emissions unit;
  - d. calculations showing the hourly and daily large batch OC emissions from each emissions unit;
  - e. calculations showing the hourly OC emissions from each emissions unit to the large batch fugitive stack; Note: this facility shall utilize a Premix Tank OC Large Batch Fugitive Stack emission factor of 3.19 E-07 lbs. OC/gal. of product produced in the Plastisol Large Batch Production Area for emissions units P336 and P337, unless otherwise approved in writing by Ohio EPA, CDO. Additionally, this facility shall utilize a Holding Tank OC Large Batch Fugitive Stack emission factor of 3.40 E-07 lbs. OC/gal. of product produced in the Plastisol Large Batch Production Area for emissions units P336 and P337, unless otherwise approved in writing by Ohio EPA, CDO;
  - f. calculations showing the hourly OC emissions from each emissions unit to the truck bay doors; Note: this facility shall utilize a Premix Tank OC Truck Bay Door emission factor of 1.95 E-08 lbs. OC/gal. of product produced in the Plastisol Large Batch Production Area for emissions units P336 and P337, unless otherwise approved in writing by Ohio EPA, CDO. Additionally, this facility shall utilize a Holding Tank OC Truck Bay Door emission factor of 2.1 E-08 lbs. OC/gal. of product produced in the Plastisol Large Batch Production Area for emissions units P336 and P337, unless otherwise approved in writing

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**PTI**

Emissions Unit ID: **P336**

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by Ohio EPA, CDO;

- g. calculations showing the hourly OC emissions from each emissions unit to the Conc/Ox stack; Note: this facility shall utilize a Premix Tank OC Conc/Ox emission factor of 2.37 E-06 lbs. OC/gal. of product produced in the Plastisol Large Batch Production Area for emissions units P336 and P337, unless otherwise approved in writing by Ohio EPA, CDO. Additionally, this facility shall utilize a Holding Tank OC Conc/Ox emission factor of 2.52 E-06 lbs. OC/gal. of product produced in the Plastisol Large Batch Production Area for emissions units P336 and P337, unless otherwise approved in writing by Ohio EPA, CDO;
  - h. calculations showing the hourly PM emissions from each emissions unit to the large batch fugitive stack; Note: this facility shall utilize a Premix Tank PM Large Batch Fugitive Stack emission factor of 3.29 E-04 lbs. PM/gal. of product produced in the Plastisol Large Batch Production Area for emissions units P336 and P337, unless otherwise approved in writing by Ohio EPA, CDO; and
  - i. calculations showing the hourly PM emissions from each emissions unit to the truck bay doors. Note: this facility shall utilize a Premix Tank PM Truck Bay Door emission factor of 2.02 E-05 lbs. PM/gal. of product produced in the Plastisol Large Batch Production Area for emissions units P336 and P337, unless otherwise approved in writing by Ohio EPA, CDO.
2. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the temperature of the exhaust gases from the thermal incinerator when the emissions unit is in operation. Units shall be in degree Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within  $\pm 1$  percent of the temperature being measured at  $\pm 5$  degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each day:

- a. the average temperature of the exhaust gases from the thermal incinerator during each of the 8 3-hour blocks of time during the day; and
  - b. a log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
3. The permittee shall maintain monthly records of the following information:

- a. the total number of gallons of throughput for each month;
- b. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of gallons of throughput; and
- c. the rolling, 12-month summation of OC emissions (summation of C.1.e thru g).

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative gallons of throughput for each calendar month.

Emissions Unit ID: **P336**

4. The permittee shall properly operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.
5. The permittee shall recalculate, on a quarterly basis, the worst case controlled VOC emission rate, in pounds per gallon of resin. This VOC emission rate shall be calculated using methodology consistent with that employed in the permit application submitted for this emissions unit on March 17, 2003 and shall be calculated using an overall control efficiency determined during the most recent emissions testing which demonstrated that the emissions unit was in compliance.

#### **D. Reporting Requirements**

1. This facility shall notify CDO of any exceedance(s) of the permitted emissions limits and/or production rate. A report of the exceedance(s), including any corrective actions taken to correct exceedance(s) shall be sent to CDO within thirty (30) days following the end of the calendar month in which the violation occurred.
2. In accordance with OAC Rule 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported within one half hour to the Ohio EPA, Central District Office.
3. This facility shall submit quarterly reports to the Central District Office, which provide the total OC emissions for the Large Batch Holding Tank, emissions unit P337, total OC emissions for the Large Batch Premix Tank, emissions unit P336, total PM emissions for the Large Batch Premix Tank, emissions unit P336, and which documents any exceedance(s) of the permitted production rate and/or emissions limits, hourly and/or daily, for the previous three (3) calendar months (October 1 through December 31, January 1 through March 31, April 1 through June 30, and July 1 through September 30, respectively). The reports shall be submitted by February 15, May 15, August 15, and November 15 of each year.
4. The permittee shall submit temperature deviation (excursion) reports that identify all 3-hour blocks of time during which the average temperature of the exhaust gases the thermal incinerator exceeded the temperature limitation specified above.

This report does not waive the reporting requirements of OAC Rule 3745-15-06.

**Akzo**

**PTI /**

**Issued: To be entered upon final issuance**

Emissions Unit ID: **P336**

5. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month gallons of throughput limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative gallons of throughput levels.

Emissions Unit ID: **P336**

6. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
7. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. an identification of each day during which the average hourly organic compound emissions exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
  - b. an identification of each day during which the organic compound emissions exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
8. These quarterly deviation (excursion) reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(2).
9. The permittee shall also submit annual reports which specifies the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

**E. Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.I of these terms and conditions shall be determined in accordance with the following method(s):
  - a. Emission Limitation- Organic compound emissions shall not exceed 8 pounds per hour and 40 pounds per day.

Applicable Compliance Method- Compliance with these emission limitations shall be determined based upon the records required in section C.1.d of these terms and conditions. If required, the permittee shall demonstrate compliance with these emission limitations through tests performed in accordance with Method 25, 25A or 18 of 40 CFR Part 60, Appendix A.

- b. Emission Limitation- Organic compound emissions shall not exceed 0.001 ton per year.

Applicable Compliance Method-

Compliance with these emission limitations shall be determined based upon the summation of the daily emissions calculated in the records required in section C.1.d of these terms and conditions.

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Emissions Unit ID: **P336**

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**PTI**

Emissions Unit ID: **P336**

**Issued: To be entered upon final issuance**

- c. Emission Limitation- Particulate emissions (PE) shall not exceed 0.42 ton per year.

Applicable Compliance Method-

Compliance with these emission limitations shall be determined based upon the summation of the daily emissions calculated in the records required in section C.1.h and C.1.i of these terms and conditions.

- d. Emission Limitation: Particulate emissions shall not exceed 1.01 pounds per hour.

Applicable Compliance Method: Compliance with these emission limitations shall be determined based upon the records required in section C.1.h and C.1.i of these terms and conditions. If required, the permittee shall demonstrate compliance with the emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-5.

- e. Emission Limitations - Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method - If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03 (B)(1).

- f. Emission limitation: Organic compound emissions shall not exceed from this emissions 0.001 ton per year and from emissions unit P337 shall not exceed 0.002 ton per year, as a rolling, 12-month summation.

Applicable Compliance Method: Compliance with this emission limitation shall be demonstrated through the summation of the values obtained from C.3.d above.

**F. Miscellaneous Requirements**

None

Akzo

PTI

Emissions Unit ID: P337

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**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

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

1. The specific operations(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 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>
P337 - 1,200 gallon holding tank (TD-212) controlled by a thermal oxidizer	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 0.002 ton per year.  Compliance with this rule also includes compliance with the requirements of OAC rules 3745-21-07(G)(2) and OAC rule 3745-35-07(B).
	OAC rule 3745-21-07(G)(2)	OC emissions shall not exceed 8 pounds per hour and 40 pounds per day.
	OAC rule 3745-35-07(B)	OC*emissions from this emissions unit shall not exceed 0.002 ton/year and from emissions unit P336 shall not exceed 0.001 ton/year, as a rolling, 12-month summation.  See A.2.a, B.1, B.2 and C.1 thru C.3  *Assume all HAP and VOC emissions are OC emissions.

**2. Additional Terms and Conditions**

- 2.a** The thermal incinerator controlling VOC emissions from this emissions unit shall operate with a minimum control efficiency of 97.55%, by weight, for VOC emissions.
- 2.b** The emissions from the Plastisol Large Batch Production Area, Premix Tank and Holding

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Tank, (emissions units P336 and P337) shall not exceed the following:

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Organic Compounds (OC) from Premix Tank	0.001 ton/year
Organic Compounds (OC) from Holding Tank	0.002 ton/year
Particulate Matter (PM) from Premix Tank	0.42 ton/year

**B. Operational Restrictions**

1. The maximum rolling twelve (12) month coatings production rate for the Plastisol Large Batch Production Area (emissions units P336 and P337) shall be limited to 843,000 gallons. The production emissions will be assigned to the day the coating is drained from the holding tank (corresponds to filling report). In order to ensure federal enforce ability, for the first twelve calendar months of operation, this facility shall not exceed the following coatings production rate limits for the specific time period:

<u>Month</u>	<u>Total Throughput (gallons)</u>
1	56,000
1-2	125,000
1-3	203,000
1-4	281,000
1-5	359,000
1-6	441,000
1-7	523,000
1-8	605,000
1-9	674,000
1-10	730,000
1-11	786,000
1-12	843,000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual throughput limitation shall be based upon a rolling, 12-month summation of the throughput.

2. The average temperature of the exhaust gases from the thermal incinerator, for any 3-hour block of time, shall not be less than 1350°F.
3. 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 said equipment, must be accompanied by the shutdown of the associated air pollution source(s).

**C. Monitoring and/or Recordkeeping Requirements**

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1. This facility shall maintain daily records which list the following information for products produced in the Plastisol Large Batch Production Area (emissions units P336 and P337):
  - a. the number of gallons of product produced in the Plastisol Large Batch Production Area;
  - b. the number of gallons of product produced in each emissions unit;
  - c. the total hours of daily operation of each emissions unit;
  - d. calculations showing the hourly and daily large batch OC emissions from each emissions unit;
  - e. calculations showing the hourly OC emissions from each emissions unit to the large batch fugitive stack; Note: this facility shall utilize a Premix Tank OC Large Batch Fugitive Stack emission factor of  $3.19 \text{ E-}07$  lbs. OC/gal. of product produced in the Plastisol Large Batch Production Area for emissions units P336 and P337, unless otherwise approved in writing by Ohio EPA, CDO. Additionally, this facility shall utilize a Holding Tank OC Large Batch Fugitive Stack emission factor of  $3.40 \text{ E-}07$  lbs. OC/gal. of product produced in the Plastisol Large Batch Production Area for emissions units P336 and P337, unless otherwise approved in writing by Ohio EPA, CDO;
  - f. calculations showing the hourly OC emissions from each emissions unit to the truck bay doors; Note: this facility shall utilize a Premix Tank OC Truck Bay Door emission factor of  $1.95 \text{ E-}08$  lbs. OC/gal. of product produced in the Plastisol Large Batch Production Area for emissions units P336 and P337, unless otherwise approved in writing by Ohio EPA, CDO. Additionally, this facility shall utilize a Holding Tank OC Truck Bay Door emission factor of  $2.1 \text{ E-}08$  lbs. OC/gal. of product produced in the Plastisol Large Batch Production Area for emissions units P336 and P337, unless otherwise approved in writing by Ohio EPA, CDO;
  - g. calculations showing the hourly OC emissions from each emissions unit to the Conc/Ox stack; Note: this facility shall utilize a Premix Tank OC Conc/Ox emission factor of  $2.37 \text{ E-}06$  lbs. OC/gal. of product produced in the Plastisol Large Batch Production Area for emissions units P336 and P337, unless otherwise approved in writing by Ohio EPA, CDO. Additionally, this facility shall utilize a Holding Tank OC Conc/Ox emission factor of  $2.25 \text{ E-}06$  lbs. OC/gal. of product produced in the Plastisol Large Batch Production Area for emissions units P336 and P337, unless otherwise approved in writing by Ohio EPA, CDO;
  - h. calculations showing the hourly PM emissions from each emissions unit to the large batch

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fugitive stack; Note: this facility shall utilize a Premix Tank PM Large Batch Fugitive Stack emission factor of 1.90 E-04 lbs. PM/gal. of product produced in the Plastisol Large Batch Production Area for emissions units P336 and P337, unless otherwise approved in writing by Ohio EPA, CDO; and

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- i. calculations showing the hourly PM emissions from each emissions unit to the truck bay doors. Note: this facility shall utilize a Premix Tank PM Truck Bay Door emission factor of 1.16 E-05 lbs. PM/gal. of product produced in the Platisol Large Batch Production Area for emissions units P336 and P337, unless otherwise approved in writing by Ohio EPA, CDO.
2. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the temperature of the exhaust gases from the thermal incinerator when the emissions unit is in operation. Units shall be in degree Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within  $\pm 1$  percent of the temperature being measured at  $\pm 5$  degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each day:

- a. the average temperature of the exhaust gases from the thermal incinerator during each of the 8 3-hour blocks of time during the day; and
- b. a log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
3. The permittee shall maintain monthly records of the following information:
  - a. the total number of gallons of throughput for each month;
  - b. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of gallons of throughput; and
  - c. the rolling, 12-month summation of OC emissions (summation of C.1.e thru g).

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative gallons of throughput for each calendar month.

4. The permittee shall recalculate, on a quarterly basis, the worst case controlled VOC emission rate, in pounds per gallon of resin. This VOC emission rate shall be calculated using methodology consistent with that employed in the permit application submitted for this emissions unit on March 17, 2003 and shall be calculated using an overall control efficiency determined during the most recent emissions testing which demonstrated that the emissions unit was in compliance.

**D. Reporting Requirements**

1. This facility shall notify CDO of any exceedance(s) of the permitted emissions limits and/or production rate. A report of the exceedance(s), including any corrective actions taken to correct exceedance(s) shall be sent to CDO within thirty (30) days following the end of the calendar month in which the violation occurred.
2. This facility shall submit quarterly reports to the Central District Office, which provide the total OC emissions for the Large Batch Holding Tank, emissions unit P337, total OC emissions for the Large Batch Premix Tank, emissions unit P336, total PM emissions for the Large Batch Premix Tank, emissions unit P336, and which documents any exceedance(s) of the permitted production rate and/or emissions limits, hourly and/or daily, for the previous three (3) calendar months (October 1 through December 31, January 1 through March 31, April 1 through June 30, and July 1 through September 30, respectively). The reports shall be submitted by February 15, May 15, August 15, and November 15 of each year.
3. In accordance with OAC Rule 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported within one half hour to the Ohio EPA, Central District Office.
4. The permittee shall submit temperature deviation (excursion) reports that identify all 3-hour blocks of time during which the average temperature of the exhaust gases the thermal incinerator exceeded the temperature limitation specified above.

This report does not waive the reporting requirements of OAC Rule 3745-15-06.

5. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month gallons of throughput limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative gallons of throughput levels.
6. The permittee shall also submit annual reports which specifies the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
7. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. an identification of each day during which the average hourly organic compound emissions exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and

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- b. an identification of each day during which the organic compound emissions exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
8. These quarterly deviation (excursion) reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(2).

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**E. Testing Requirements**

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

a. Emission Limitation- Organic compound emissions shall not exceed 8 pounds per hour and 40 pounds per day.

Applicable Compliance Method- Compliance with these emission limitations shall be determined based upon the records required in section C.1.d of these terms and conditions. If required, the permittee shall demonstrate compliance with these emission limitations through tests performed in accordance with Method 25, 25A or 18 of 40 CFR Part 60, Appendix A.

b. Emission Limitation- Organic compound emissions shall not exceed 0.002 ton per year.

Applicable Compliance Method-

Compliance with these emission limitations shall be determined based upon the summation of the daily emissions calculated in the records required in section C.1.d of these terms and conditions.

c. Emission limitation: OC\*emissions from this emissions unit shall not exceed 0.002 ton/year and from emissions unit P336 shall not exceed 0.001 ton/year, as a rolling, 12-month summation.

Applicable Compliance Method: Compliance with this emission limitation shall be demonstrated through the summation of the values obtained from C.3.c above.

**F. Miscellaneous Requirements**

None

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**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

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

1. The specific operations(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 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>
P338 - Portable tank mixing station(AG-794) controlled by a fabric filter and thermal oxidizer	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) shall not exceed 0.50 pound per hour and 0.07 ton per year.  Organic compound (OC)emissions shall not exceed 0.001 ton per year.  Compliance with this rule also includes compliance with the requirements of OAC rules 3745-17-07(A)(1), 3745-21-07(G)(2)and 3745-35-07(B).
	OAC rule 3745-21-07(G)(2)	OC emissions shall not exceed 8 pounds per hour and 40 pounds per day.
	OAC rule 3745-17-11(B)(1)	The PE specified by this rule is less stringent than the PE established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)(1)	Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-35-07(B)	OC*emissions from this emissions unit shall not exceed 0.001 ton/year, as a rolling, 12-month summation.

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See A.2.a, B.1, B.3 and C.1  
thru C.3.

\*Assume all HAP and VOC  
emissions are OC emissions.

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**2. Additional Terms and Conditions**

- 2.a** The thermal incinerator controlling VOC emissions from this emissions unit shall operate with a minimum control efficiency of 97.55%, by weight, for VOC emissions.
- 2.b** The baghouse controlling particulate emissions from this emissions unit shall operate with a grain loading of less than 0.03 grains per dry standard cubic foot.
- 2.c** The emissions from the Plastisol Small Batch Portable Production Area Mixing Station, (emissions unit P338) shall not exceed the following:

Organic Compounds (OC)	0.001 ton/year
Particulate Matter (PM)	0.07 ton/year

**B. Operational Restrictions**

- 1. The maximum rolling twelve (12) month coatings production rate for the Plastisol Small Batch Primary Portable Production Area, Mixing Station, (emissions unit P338) shall be limited 132,000 gallons. The production rate shall be calculated at the time the product is put into drums or totes (corresponds to filling report). In order to ensure federal enforce ability, for the first twelve calendar months of operation, this facility shall not exceed the following coatings production rate limits for the specific time period:

<u>Month</u>	<u>Total Throughput (gallons)</u>
1	9,000
1-2	20,000
1-3	32,000
1-4	44,000
1-5	56,000
1-6	69,000
1-7	82,000
1-8	95,000
1-9	106,000
1-10	115,000
1-11	124,000
1-12	132,000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual throughput limitation shall be based upon a rolling, 12-month summation of the

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throughput.

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2. 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 said equipment, must be accompanied by the shutdown of the associated air pollution source(s).
3. The average temperature of the exhaust gases from the thermal incinerator, for any 3-hour block of time, shall not be less than 1350°F.
4. The pressure drop across the baghouse controlling emissions from this emissions unit shall be maintained within the range of 4 to 6 inches of water while this emissions unit is in operation.

**C. Monitoring and/or Recordkeeping Requirements**

1. This facility shall maintain daily records which list the following information for products produced in the Plastisol Small Batch Portable Production Area (emissions unit P338):
  - a. the number of gallons of product produced in the Plastisol Small Batch Portable Production Area;
  - b. the number of gallons of product produced in each emissions unit;
  - c. the total hours of daily operation of each emissions unit;
  - d. calculations showing the hourly OC emissions from each emissions unit to the Small Batch Fugitive Stack; Note: this facility shall utilize a Mixing Station OC Small Batch Primary Portable Fugitive Stack emission factor of 4.78 E-07 lbs. OC/gal. of product produced in the Plastisol Small Batch Portable Production Area for emissions unit P338, unless otherwise approved in writing by Ohio EPA, CDO;
  - e. calculations showing the hourly OC emissions from each emissions unit to the Truck Bay Doors; Note: this facility shall utilize a Mixing Station OC Small Batch Primary Portable Truck Bay Door emission factor of 1.95 E-08 lbs. OC/gal. of product produced in the Plastisol Small Batch Portable Production Area for emissions unit P338, unless otherwise approved in writing by Ohio EPA, CDO;
  - f. calculations showing the hourly OC emissions from each emissions unit to the Conc/Ox Stack; Note: this facility shall utilize a Mixing Station OC Small Batch Primary Portable Conc/Ox emission factor of 1.60 E-05 lbs. OC/gal. of product produced in the Plastisol Small Batch Portable Production Area for emissions unit P338, unless otherwise approved in writing by Ohio EPA, CDO;

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- g. calculations showing the hourly PM emissions from each emissions unit to the Conc/Ox Stack; Note: this facility shall utilize a Mixing Station PM Small Batch Primary Portable Conc/Ox emission factor of 4.27 E-04 lbs. PM/gal. of product produced in the Plastisol Small Batch Portable Production Area for emissions unit P338, unless otherwise approved in writing by Ohio EPA, CDO;
  - h. calculations showing the hourly PM emissions from each emissions unit to the truck bay doors; Note: this facility shall utilize a Mixing Station PM Small Batch Primary Portable Truck Bay Door emission factor of 1.16 E-05 lbs. PM/gal. of product produced in the Plastisol Small Batch Portable Production Area for emissions unit P338, unless otherwise approved in writing by Ohio EPA, CDO;
  - i. calculations showing the hourly PM emissions from each emissions unit to the fugitive stacks. Note: This facility shall utilize a Mixing Station PM Small Batch Primary Portable fugitive stack emission factor of 2.85 E-04 lbs. PM/gal. of product produced in the Plastisol Small Batch Portable Production Area for emissions unit P338, unless otherwise approved in writing by Ohio EPA, CDO;
    - j. calculations showing the total hourly and daily OC emissions from emissions unit P338; and
    - k. calculations showing the hourly and daily PM emissions from emissions unit P338.
2. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the temperature of the exhaust gases from the thermal incinerator when the emissions unit is in operation. Units shall be in degree Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within  $\pm 1$  percent of the temperature being measured at  $\pm 5$  degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.
- The permittee shall collect and record the following information each day:
- a. the average temperature of the exhaust gases from the thermal incinerator during each of the 8 3-hour blocks of time during the day; and
  - b. a log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
3. The permittee shall maintain monthly records of the following information:
- a. the total number of gallons of throughput for each month;
  - b. beginning after the first 12 calendar months of operation following the issuance of this

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permit, the rolling, 12-month summation of gallons of throughput; and

- c. the rolling, 12-month summation of OC emissions (summation of C.1.e thru g).

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative gallons of throughput for each calendar month.

4. The permittee shall recalculate, on a quarterly basis, the worst case controlled VOC emission rate, in pounds per gallon of resin. This VOC emission rate shall be calculated using methodology consistent with that employed in the permit application submitted for this emissions unit on March 17, 2003 and shall be calculated using an overall control efficiency determined during the most recent emissions testing which demonstrated that the emissions unit was in compliance.
5. The permittee shall properly operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.

**D. Reporting Requirements**

1. This facility shall notify CDO of any exceedance(s) of the permitted emissions limits and/or production rate. A report of the exceedance(s), including any corrective actions taken to correct exceedance(s) shall be sent to CDO within thirty (30) days following the end of the calendar month in which the violation occurred.
2. This facility shall submit quarterly reports to the Central District Office, which provide the total OC and PM emissions from the Plastisol Small Batch Portable Production Area, (emissions unit P338), and which documents any exceedance(s) of the permitted production rate and/or emissions limits, hourly and/or daily, for the previous three (3) calendar months (October 1 through December 31, January 1 through March 31, April 1 through June 30, and July 1 through September 30, respectively).
3. In accordance with OAC Rule 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported within one half hour to the Ohio EPA, Central District Office.
4. The permittee shall submit temperature deviation (excursion) reports that identify all 3-hour blocks of time during which the average temperature of the exhaust gases the thermal incinerator

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exceeded the temperature limitation specified above.

This report does not waive the reporting requirements of OAC Rule 3745-15-06.

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5. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month gallons of throughput limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative gallons of throughput levels.
6. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
7. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. an identification of each day during which the average hourly organic compound emissions exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
  - b. an identification of each day during which the organic compound emissions exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
8. These quarterly deviation (excursion) reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(2).
9. The permittee shall also submit annual reports which specifies the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

**E. Testing Requirements**

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

- a. Emission Limitation- Organic compound emissions shall not exceed 8 pounds per hour and 40 pounds per day.

Applicable Compliance Method- Compliance with these emission limitations shall be determined based upon the records required in section C.1.j of these terms and conditions. If required, the permittee shall demonstrate compliance with these emission limitations through tests performed in accordance with Method 25, 25A or 18 of 40 CFR Part 60, Appendix A.

- b. Emission Limitation- Organic compound emissions shall not exceed 0.001 ton per year.

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Applicable Compliance Method-

Compliance with these emission limitations shall be determined based upon the summation of the daily emissions calculated in the records required in section C.1.j of these terms and conditions.

- c. Emission Limitation- Particulate emissions (PE) shall not exceed 0.07 ton per year.

Applicable Compliance Method- Compliance with these emission limitations shall be determined based upon the records required in section C.1.k of these terms and conditions.

- d. Emission Limitation: Particulate emissions shall not exceed 0.5 pound per hour and 0.03 grains per dry standard cubic foot.

Applicable Compliance Method: Compliance with these emission limitations shall be determined based upon the records required in section C.1.k of these terms and conditions. If required, the permittee shall demonstrate compliance with the emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-5.

- e. Emission Limitations - Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method - If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03 (B)(1).

- f. Emission Limitations: OC emissions from this emissions unit shall not exceed 0.001 ton/year, as a rolling, 12-month summation.

Applicable Compliance Method: Compliance with these emission limitations shall be determined based upon the records required in section C.1.j of these terms and conditions.

**F. Miscellaneous Requirements**

None

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

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

1. The specific operations(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 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>
P339 - Verator De-aerator (D-1) controlled by a thermal oxidizer	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 0.0009 ton per year.  Compliance with this rule also includes compliance with the requirements of OAC rules 3745-21-07(G)(2) and 3745-35-07(B).
	OAC rule 3745-21-07(G)(2)	OC emissions shall not exceed 8 pounds per hour and 40 pounds per day.
	OAC rule 3745-35-07(B)	OC*emissions from this emissions unit shall not exceed 0.0009 ton/year, as a rolling, 12-month summation.  See A.2.a, B.1, B.3 and C.1 thru C.3.  *Assume all HAP and VOC emissions are OC emissions.

**2. Additional Terms and Conditions**

- 2.a The thermal incinerator controlling VOC emissions from this emissions unit shall operate with a minimum control efficiency of 97.55%, by weight, for VOC emissions.
- 2.b The emissions from the De-aerators, emissions units P339 through P341, shall not exceed the following:

Organic Compounds (OC)	0.0009 ton/year
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## B. Operational Restrictions

- The De-aerators are located in the Large Batch Production Area. The maximum rolling twelve (12) month coatings production rate for the De-aerators, emissions units P339 through P341, shall be limited to 975,000 gallons. This limit is the sum of Plastisol Large Batch Production Area, limited to 843,000 gallons of coating per rolling twelve months, and Plastisol Small Batch Portable Production Area, limited to 132,000 gallons of coating per rolling twelve months. In order to ensure federal enforceability, for the first twelve calendar months of operation, this facility shall not exceed the following coatings production rate limits for the specific time period.

For Plastisol Large Batch Production Area:

<u>Month</u>	<u>Total Throughput (gallons)</u>
1	65,000
1-2	145,000
1-3	235,000
1-4	325,000
1-5	415,000
1-6	510,000
1-7	605,000
1-8	700,000
1-9	780,000
1-10	845,000
1-11	910,000
1-12	975,000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual throughput limitation shall be based upon a rolling, 12-month summation of the throughput.

- 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 said equipment, must be accompanied by the shutdown of the associated air pollution source(s).
- The average temperature of the exhaust gases from the thermal incinerator, for any 3-hour block of time, shall not be less than 1350°F.

## C. Monitoring and/or Recordkeeping Requirements

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1. This facility shall maintain daily records which list the following information for products deaerated in the De-aerators (emissions units P339 through P341):
  - a. the number of gallons of product deaerated in each emissions unit;
  - b. the production area product deaerated;
  - c. the total hours of daily operation of each emissions unit;
  - d. total gallons deaerated in the Plastisol Large Batch Production Area;
- e. calculations showing the hourly and daily OC emissions from each emissions unit;
  - f. calculations showing the hourly OC emissions from each emissions unit to the Large Batch Fugitive Stack; Note: this facility shall utilize a Deaerator OC Large Batch Fugitive Stack emission factor of 1.69 E-07 lbs. OC/gal. of product produced in the Plastisol Large Batch Production Area and Plastisol Small Batch Portable Production Area for emissions units P339 through P341, unless otherwise approved in writing by Ohio EPA, CDO;
  - g. calculations showing the hourly OC emissions from each emissions unit to the Truck Bay Doors; Note: this facility shall utilize a Deaerator OC Truck Bay Door emission factor of 1.04 E-08 lbs. OC/gal. of product produced in the Plastisol Large Batch Production Area and Plastisol Small Batch Portable Production Area for emissions units P339 through P341, unless otherwise approved in writing by Ohio EPA, CDO; and
  - h. calculations showing the hourly OC emissions from the emissions unit to the Conc/Ox Stack.

Note: This facility shall utilize a Deaerator OC Conc/Ox emission factor of 1.26 E-06 lbs. OC/gal. of product produced in the Plastisol Large Batch Production Area and Plastisol Small Batch Portable Production Area for emissions units P339 through P341, unless otherwise approved in writing by Ohio EPA, CDO.

2. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the temperature of the exhaust gases from the thermal incinerator when the emissions unit is in operation. Units shall be in degree Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within  $\pm 1$  percent of the temperature being measured at  $\pm 5$  degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each day:

- a. the average temperature of the exhaust gases from the thermal incinerator during each of the 8 3-hour blocks of time during the day; and
  - b. a log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
3. The permittee shall maintain monthly records of the following information:
- a. the total number of gallons of throughput for each month;
  - b. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of gallons of throughput; and
  - c. the rolling, 12-month summation of OC emissions (summation of C.1.e thru g).

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative gallons of throughput for each calendar month.

4. The permittee shall recalculate, on a quarterly basis, the worst case controlled VOC emission rate, in pounds per gallon of resin. This VOC emission rate shall be calculated using methodology consistent with that employed in the permit application submitted for this emissions unit on March 17, 2003 and shall be calculated using an overall control efficiency determined during the most recent emissions testing which demonstrated that the emissions unit was in compliance.

#### **D. Reporting Requirements**

1. This facility shall notify CDO of any exceedance(s) of the permitted emissions limits and/or production rate. A report of the exceedance(s), including any corrective actions taken to correct exceedance(s) shall be sent to CDO within thirty (30) days following the end of the calendar month in which the violation occurred.
2. In accordance with OAC Rule 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported within one half hour to the Ohio EPA, Central District Office.
3. This facility shall submit quarterly reports to the CDO that provide the total OC emissions for the De-aerators (emissions units P339 through P341), and which document any exceedance(s) of the permitted production rate and/or emissions limits, hourly and/or daily, for the previous three (3) calendar months (October 1 through December 31, January 1 through March 31, April 1 through

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June 30, and July 1 through September 30, respectively). The reports shall be submitted by February 15, May 15, August 15, and November 15 of each year.

4. The permittee shall submit temperature deviation (excursion) reports that identify all 3-hour blocks of time during which the average temperature of the exhaust gases the thermal incinerator exceeded the temperature limitation specified above.

This report does not waive the reporting requirements of OAC Rule 3745-15-06.

5. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month gallons of throughput limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative gallons of throughput levels.
6. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. an identification of each day during which the average hourly organic compound emissions exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
  - b. an identification of each day during which the organic compound emissions exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
7. These quarterly deviation (excursion) reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(2).
8. The permittee shall also submit annual reports which specifies the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

#### **E. Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.I of these terms and conditions shall be determined in accordance with the following method(s):
  - a. Emission Limitation- Organic compound emissions shall not exceed 8 pounds per hour and 40 pounds per day.

Applicable Compliance Method- Compliance with these emission limitations shall be determined based upon the records required in section C.1.e of these terms and conditions. If required, the permittee shall demonstrate compliance with these emission limitations through tests performed in accordance with Method 25, 25A or 18 of 40 CFR Part 60, Appendix A.
  - b. Emission Limitation- Organic compound emissions shall not exceed 0.0009 ton per year.

Applicable Compliance Method-

Compliance with these emission limitations shall be determined based upon the summation of the daily emissions calculated in the records required in section C.1.e of these terms

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**Issued: To be entered upon final issuance**

and conditions.

- c. Emission Limitation: OC emissions from this emissions unit shall not exceed 0.0009 ton/year, as a rolling, 12-month summation.

Applicable Compliance Method: Compliance with these emission limitations shall be determined based upon the summation of the daily emissions calculated in the records required in section C.1.e of these terms and conditions.

**F. Miscellaneous Requirements**

None

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

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

1. The specific operations(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 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>
P340 - Verator De-aerator (D-2) controlled by a thermal incinerator	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 0.0009 ton per year.  Compliance with this rule also includes compliance with the requirements of OAC rules 3745-21-07(G)(2) and 3745-35-07(B).
	OAC rule 3745-21-07(G)(2)	OC emissions shall not exceed 8 pounds per hour and 40 pounds per day.
	OAC rule 3745-35-07(B)	OC*emissions from this emissions unit shall not exceed 0.0009 ton/year, as a rolling, 12-month summation.  See A.2.a, B.1, B.3 and C.1 thru C.3.  *Assume all HAP and VOC emissions are OC emissions.

**2. Additional Terms and Conditions**

- 2.a The thermal incinerator controlling VOC emissions from this emissions unit shall operate with a minimum control efficiency of 97.55%, by weight, for VOC emissions.
- 2.b The emissions from the De-aerators, emissions units P339 through P341, shall not exceed the following:

Organic Compounds (OC)	0.0009 ton/year
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**B. Operational Restrictions**

1. The De-aerators are located in the Large Batch Production Area. The maximum rolling twelve (12) month coatings production rate for the De-aerators, emissions units P339 through P341, shall be limited to 975,000 gallons. This limit is the sum of Plastisol Large Batch Production Area, limited to 843,000 gallons of coating per rolling twelve months, and Plastisol Small Batch Portable Production Area, limited to 132,000 gallons of coating per rolling twelve months. In order to ensure federal enforceability, for the first twelve calendar months of operation, this facility shall not exceed the following coatings production rate limits for the specific time period.

For Plastisol Large Batch Production Area:

<u>Month</u>	<u>Total Throughput (gallons)</u>
1	65,000
1-2	145,000
1-3	235,000
1-4	325,000
1-5	415,000
1-6	510,000
1-7	605,000
1-8	700,000
1-9	780,000
1-10	845,000
1-11	910,000
1-12	975,000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual throughput limitation shall be based upon a rolling, 12-month summation of the throughput.

2. 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 said equipment, must be accompanied by the shutdown of the associated air pollution source(s).
3. The average temperature of the exhaust gases from the thermal incinerator, for any 3-hour block of time, shall not be less than 1350°F.

**C. Monitoring and/or Recordkeeping Requirements**

**Issued: To be entered upon final issuance**

1. This facility shall maintain daily records which list the following information for products deaerated in the De-aerators (emissions units P339 through P341):
  - a. the number of gallons of product deaerated in each emissions unit;
  - b. the production area product deaerated;
  - c. the total hours of daily operation of each emissions unit;
  - d. total gallons deaerated in the Plastisol Large Batch Production Area;
- e. calculations showing the hourly and daily OC emissions from each emissions unit;
  - f. calculations showing the hourly OC emissions from each emissions unit to the Large Batch Fugitive Stack; Note: this facility shall utilize a Deaerator OC Large Batch Fugitive Stack emission factor of 1.69 E-07 lbs. OC/gal. of product produced in the Plastisol Large Batch Production Area and Plastisol Small Batch Portable Production Area for emissions units P339 through P341, unless otherwise approved in writing by Ohio EPA, CDO;
  - g. calculations showing the hourly OC emissions from each emissions unit to the Truck Bay Doors; Note: this facility shall utilize a Deaerator OC Truck Bay Door emission factor of 1.04 E-08 lbs. OC/gal. of product produced in the Plastisol Large Batch Production Area and Plastisol Small Batch Portable Production Area for emissions units P339 through P341, unless otherwise approved in writing by Ohio EPA, CDO; and
  - h. calculations showing the hourly OC emissions from the emissions unit to the Conc/Ox Stack.

Note: This facility shall utilize a Deaerator OC Conc/Ox emission factor of 1.26 E-06 lbs. OC/gal. of product produced in the Plastisol Large Batch Production Area and Plastisol Small Batch Portable Production Area for emissions units P339 through P341, unless otherwise approved in writing by Ohio EPA, CDO.

2. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the temperature of the exhaust gases from the thermal incinerator when the emissions unit is in operation. Units shall be in degree Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within  $\pm 1$  percent of the temperature being measured at  $\pm 5$  degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

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**Issue**

**Facility ID: 0125040064**

Emissions Unit ID: **P340**

The permittee shall collect and record the following information each day:

- a. the average temperature of the exhaust gases from the thermal incinerator during each of the 8 3-hour blocks of time during the day; and
- b. a log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

3. The permittee shall maintain monthly records of the following information:
  - a. the total number of gallons of throughput for each month;
  - b. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of gallons of throughput; and
  - c. the rolling, 12-month summation of OC emissions (summation of C.1.e thru g).

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative gallons of throughput for each calendar month.

4. The permittee shall recalculate, on a quarterly basis, the worst case controlled VOC emission rate, in pounds per gallon of resin. This VOC emission rate shall be calculated using methodology consistent with that employed in the permit application submitted for this emissions unit on March 17, 2003 and shall be calculated using an overall control efficiency determined during the most recent emissions testing which demonstrated that the emissions unit was in compliance.

#### **D. Reporting Requirements**

1. This facility shall notify CDO of any exceedance(s) of the permitted emissions limits and/or production rate. A report of the exceedance(s), including any corrective actions taken to correct exceedance(s) shall be sent to CDO within thirty (30) days following the end of the calendar month in which the violation occurred.
2. In accordance with OAC Rule 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported within one half hour to the Ohio EPA, Central District Office.
3. This facility shall submit quarterly reports to the CDO that provide the total OC emissions for the De-aerators (emissions units P339 through P341), and which document any exceedance(s) of the permitted production rate and/or emissions limits, hourly and/or daily, for the previous three (3) calendar months (October 1 through December 31, January 1 through March 31, April 1 through June 30, and July 1 through September 30, respectively). The reports shall be submitted by February 15, May 15, August 15, and November 15 of each year.
4. The permittee shall submit temperature deviation (excursion) reports that identify all 3-hour blocks of time during which the average temperature of the exhaust gases the thermal incinerator exceeded the temperature limitation specified above.

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This report does not waive the reporting requirements of OAC Rule 3745-15-06.

5. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month gallons of throughput limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative gallons of throughput levels.
6. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. an identification of each day during which the average hourly organic compound emissions exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
  - b. an identification of each day during which the organic compound emissions exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
7. These quarterly deviation (excursion) reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(2).
8. The permittee shall also submit annual reports which specifies the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

**E. Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.I of these terms and conditions shall be determined in accordance with the following method(s):
  - a. Emission Limitation- Organic compound emissions shall not exceed 8 pounds per hour and 40 pounds per day.  
  
Applicable Compliance Method- Compliance with these emission limitations shall be determined based upon the records required in section C.1.e of these terms and conditions. If required, the permittee shall demonstrate compliance with these emission limitations through tests performed in accordance with Method 25, 25A or 18 of 40 CFR Part 60, Appendix A.
  - b. Emission Limitation- Organic compound emissions shall not exceed 0.0009 ton per year.  
  
Applicable Compliance Method-

Compliance with these emission limitations shall be determined based upon the summation of the daily emissions calculated in the records required in section C.1.e of these terms and conditions.

- c. Emission Limitation: OC emissions from this emissions unit shall not exceed 0.0009 ton/year, as a rolling, 12-month summation.

Applicable Compliance Method: Compliance with these emission limitations shall be determined based upon the summation of the daily emissions calculated in the records required in section C.1.e of these terms and conditions.

#### **F. Miscellaneous Requirements**

None

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**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

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

1. The specific operations(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 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>
P341 - Verator De-aerator (D-3) controlled by a thermal incinerator	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 0.0009 ton per year.  Compliance with this rule also includes compliance with the requirements of OAC rules 3745-21-07(G)(2) and 3745-35-07(B).
	OAC rule 3745-21-07(G)(2)	OC emissions shall not exceed 8 pounds per hour and 40 pounds per day.
	OAC rule 3745-35-07(B)	OC*emissions from this emissions unit shall not exceed 0.0009 ton/year, as a rolling, 12-month summation.  See A.2.a, B.1, B.3 and C.1 thru C.3.  *Assume all HAP and VOC emissions are OC emissions.

**2. Additional Terms and Conditions**

- 2.a The thermal incinerator controlling VOC emissions from this emissions unit shall operate with a minimum control efficiency of 97.55%, by weight, for VOC emissions.
- 2.b The emissions from the De-aerators, emissions units P339 through P341, shall not exceed the following:

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Organic Compounds (OC)

0.0009 ton/year

## B. Operational Restrictions

1. The De-aerators are located in the Large Batch Production Area. The maximum rolling twelve (12) month coatings production rate for the De-aerators, emissions units P339 through P341, shall be limited to 975,000 gallons. This limit is the sum of Platisol Large Batch Production Area, limited to 843,000 gallons of coating per rolling twelve months, and Platisol Small Batch Portable Production Area, limited to 132,000 gallons of coating per rolling twelve months. In order to ensure federal enforceability, for the first twelve calendar months of operation, this facility shall not exceed the following coatings production rate limits for the specific time period.

For Platisol Large Batch Production Area:

<u>Month</u>	<u>Total Throughput (gallons)</u>
1	65,000
1-2	145,000
1-3	235,000
1-4	325,000
1-5	415,000
1-6	510,000
1-7	605,000
1-8	700,000
1-9	780,000
1-10	845,000
1-11	910,000
1-12	975,000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual throughput limitation shall be based upon a rolling, 12-month summation of the throughput.

2. 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 said equipment, must be accompanied by the shutdown of the associated air pollution source(s).
3. The average temperature of the exhaust gases from the thermal incinerator, for any 3-hour block of time, shall not be less than 1350°F.

### C. Monitoring and/or Recordkeeping Requirements

1. This facility shall maintain daily records which list the following information for products deaerated in the De-aerators (emissions units P339 through P341):
    - a. the number of gallons of product deaerated in each emissions unit;
    - b. the production area product deaerated;
    - c. the total hours of daily operation of each emissions unit;
    - d. total gallons deaerated in the Plastisol Large Batch Production Area;
  - e. calculations showing the hourly and daily OC emissions from each emissions unit;
  - f. calculations showing the hourly OC emissions from each emissions unit to the Large Batch Fugitive Stack; Note: this facility shall utilize a Deaerator OC Large Batch Fugitive Stack emission factor of 1.69 E-07 lbs. OC/gal. of product produced in the Plastisol Large Batch Production Area and Plastisol Small Batch Portable Production Area for emissions units P339 through P341, unless otherwise approved in writing by Ohio EPA, CDO;
  - g. calculations showing the hourly OC emissions from each emissions unit to the Truck Bay Doors; Note: this facility shall utilize a Deaerator OC Truck Bay Door emission factor of 1.04 E-08 lbs. OC/gal. of product produced in the Plastisol Large Batch Production Area and Plastisol Small Batch Portable Production Area for emissions units P339 through P341, unless otherwise approved in writing by Ohio EPA, CDO. and
  - h. calculations showing the hourly OC emissions from the emissions unit to the Conc/Ox Stack.

Note: This facility shall utilize a Deaerator OC Conc/Ox emission factor of 1.26 E-06 lbs. OC/gal. of product produced in the Plastisol Large Batch Production Area and Plastisol Small Batch Portable Production Area for emissions units P339 through P341, unless otherwise approved in writing by Ohio EPA, CDO.
2. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the temperature of the exhaust gases from the thermal incinerator when the emissions unit is in operation. Units shall be in degree Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within  $\pm 1$  percent of the temperature being measured at  $\pm 5$  degrees Fahrenheit, whichever is greater. The

temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each day:

- a. the average temperature of the exhaust gases from the thermal incinerator during each of the 8 3-hour blocks of time during the day; and
  - b. a log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
3. The permittee shall maintain monthly records of the following information:
- a. the total number of gallons of throughput for each month;
  - b. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of gallons of throughput; and
  - c. the rolling, 12-month summation of OC emissions (summation of C.1.e thru g).

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative gallons of throughput for each calendar month.

4. The permittee shall recalculate, on a quarterly basis, the worst case controlled VOC emission rate, in pounds per gallon of resin. This VOC emission rate shall be calculated using methodology consistent with that employed in the permit application submitted for this emissions unit on March 17, 2003 and shall be calculated using an overall control efficiency determined during the most recent emissions testing which demonstrated that the emissions unit was in compliance.

#### **D. Reporting Requirements**

1. This facility shall notify CDO of any exceedance(s) of the permitted emissions limits and/or production rate. A report of the exceedance(s), including any corrective actions taken to correct exceedance(s) shall be sent to CDO within thirty (30) days following the end of the calendar month in which the violation occurred.
2. In accordance with OAC Rule 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported within one half hour to the Ohio EPA, Central District Office.
3. This facility shall submit quarterly reports to the CDO that provide the total OC emissions for the De-aerators (emissions units P339 through P341), and which document any exceedance(s) of the

permitted production rate and/or emissions limits, hourly and/or daily, for the previous three (3) calendar months (October 1 through December 31, January 1 through March 31, April 1 through June 30, and July 1 through September 30, respectively). The reports shall be submitted by February 15, May 15, August 15, and November 15 of each year.

4. The permittee shall submit temperature deviation (excursion) reports that identify all 3-hour blocks of time during which the average temperature of the exhaust gases the thermal incinerator exceeded the temperature limitation specified above.

This report does not waive the reporting requirements of OAC Rule 3745-15-06.

5. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month gallons of throughput limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative gallons of throughput levels.
6. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. an identification of each day during which the average hourly organic compound emissions exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
  - b. an identification of each day during which the organic compound emissions exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
7. These quarterly deviation (excursion) reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(2).
8. The permittee shall also submit annual reports which specifies the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

#### **E. Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.I of these terms and conditions shall be determined in accordance with the following method(s):
  - a. Emission Limitation- Organic compound emissions shall not exceed 8 pounds per hour and 40 pounds per day.

Applicable Compliance Method- Compliance with these emission limitations shall be

Emissions Unit ID: **P341**

determined based upon the records required in section C.1.e of these terms and conditions. If required, the permittee shall demonstrate compliance with these emission limitations through tests performed in accordance with Method 25, 25A or 18 of 40 CFR Part 60, Appendix A.

- b. Emission Limitation- Organic compound emissions shall not exceed 0.0009 ton per year.

Applicable Compliance Method-

Compliance with these emission limitations shall be determined based upon the summation of the daily emissions calculated in the records required in section C.1.e of these terms and conditions.

- c. Emission Limitation: OC emissions from this emissions unit shall not exceed 0.0009 ton/year, as a rolling, 12-month summation.

Applicable Compliance Method: Compliance with these emission limitations shall be determined based upon the summation of the daily emissions calculated in the records required in section C.1.e of these terms and conditions.

## **F. Miscellaneous Requirements**

None

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

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

1. The specific operations(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 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>
P342 - Vortisiv filtration unit (V-1) controlled by a thermal incinerator	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 0.002 ton per year.  Compliance with this rule also includes compliance with the requirements of OAC rules 3745-21-07(G)(2) and 3745-35-07(B).
	OAC rule 3745-21-07(G)(2)	OC emissions shall not exceed 8 pounds per hour and 40 pounds per day.
	OAC rule 3745-35-07(B)	OC*emissions from this emissions unit shall not exceed 0.002 ton/year, as a rolling, 12-month summation.  See A.2.a, B.1 and B.3 and C.1 thru C.3.  *Assume all HAP and VOC emissions are OC emissions.

**2. Additional Terms and Conditions**

- 2.a The thermal incinerator controlling VOC emissions from this emissions unit shall operate with a minimum control efficiency of 97.55%, by weight, for VOC emissions.
- 2.b The emissions from the Filtration Units, emissions units P342 through P344, shall not exceed the following:

Organic Compounds (OC)	0.002 ton/year
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## B. Operational Restrictions

1. The Filtration Units are located in the Plastisol Large Batch Production Area. The maximum rolling twelve (12) month coatings production rate for the Filtration Units, emissions units P342 through P344, shall be limited to 975,000 gallons. This limit is the sum of the Plastisol Large Batch Production Area, limited to 843,000 gallons of coating per rolling twelve months, and the Plastisol Small Batch Portable Production Area, limited to 132,000 gallons of coating per rolling twelve months. In order to ensure federal enforceability, for the first twelve calendar months of operation, this facility shall not exceed the following coatings production rate limits for the specific time period.

For Plastisol Large Batch Production Area:

<u>Month</u>	<u>Total Throughput (gallons)</u>
1	65,000
1-2	145,000
1-3	235,000
1-4	325,000
1-5	415,000
1-6	510,000
1-7	605,000
1-8	700,000
1-9	780,000
1-10	845,000
1-11	910,000
1-12	975,000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual throughput limitation shall be based upon a rolling, 12-month summation of the throughput.

2. 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 said equipment, must be accompanied by the shutdown of the associated air pollution source(s).
3. The average temperature of the exhaust gases from the thermal incinerator, for any 3-hour block of time, shall not be less than 1350°F.

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### C. Monitoring and/or Recordkeeping Requirements

1. This facility shall maintain daily records which list the following information for products filtered in the Filtration Units (emissions units P342 through P344):
  - a. the number of gallons of product filtered in each emissions unit;
  - b. the production area product filtered;
  - c. the total hours of daily operation of each emissions unit;
  - d. total gallons filtered in the Plastisol Large Batch Production Area;
  - e. calculations showing the hourly and daily OC emissions from each emissions unit;
  - f. calculations showing the hourly OC emissions from each emissions unit to the Large Batch Fugitive Stack; Note: this facility shall utilize a Filtration Units OC Large Batch Fugitive Stack emission factor of 3.40 E-07 lbs. OC/gal. of product produced in the Plastisol Large Batch Production Area and Plastisol Small Batch Portable Production Area for emissions units P342 through P344, unless otherwise approved in writing by Ohio EPA, CDO;
  - g. calculations showing the hourly OC emissions from each emissions unit to the Truck Bay Doors; Note: this facility shall utilize a Filtration Units OC Truck Bay Door emission factor of 2.08 E-08 lbs. OC/gal. of product produced in the Plastisol Large Batch Production Area and Plastisol Small Batch Portable Production Area for emissions units P342 through P344, unless otherwise approved in writing by Ohio EPA, CDO. and
  - h. calculations showing the hourly OC emissions from the emissions unit to the Conc/Ox Stack.

Note: this facility shall utilize a Filtration Units OC Conc/Ox emission factor of 2.51 E-06 lbs. OC/gal. of product produced in the Plastisol Large Batch Production Area and Plastisol Small Batch Portable Production Area for emissions units P342 through P344, unless otherwise approved in writing by Ohio EPA, CDO.

2. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the temperature of the exhaust gases from the thermal incinerator when the emissions unit is in operation. Units shall be in degree Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within  $\pm 1$

percent of the temperature being measured at  $\pm 5$  degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each day:

- a. the average temperature of the exhaust gases from the thermal incinerator during each of the 8 3-hour blocks of time during the day; and

- b. a log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
3. The permittee shall maintain monthly records of the following information:
  - a. the total number of gallons of throughput for each month;
  - b. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of gallons of throughput; and
  - c. the rolling, 12-month summation of OC emissions (summation of C.1.e thru g).

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative gallons of throughput for each calendar month.

- 4. The permittee shall recalculate, on a quarterly basis, the worst case controlled VOC emission rate, in pounds per gallon of resin. This VOC emission rate shall be calculated using methodology consistent with that employed in the permit application submitted for this emissions unit on March 17, 2003 and shall be calculated using an overall control efficiency determined during the most recent emissions testing which demonstrated that the emissions unit was in compliance.

#### **D. Reporting Requirements**

1. This facility shall notify CDO of any exceedance(s) of the permitted emissions limits and/or production rate. A report of the exceedance(s), including any corrective actions taken to correct exceedance(s) shall be sent to CDO within thirty (30) days following the end of the calendar month in which the violation occurred.
2. In accordance with OAC Rule 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported within one half hour to the Ohio EPA, Central District Office.
3. This facility shall submit quarterly reports to the CDO that provide the total OC emissions for Filtration Units (emissions units P342 through P344), and which document any exceedance(s) of the permitted production rate and/or emissions limits, hourly and/or daily, for the previous three (3) calendar months (October 1 through December 31, January 1 through March 31, April 1 through June 30, and July 1 through September 30, respectively). The reports shall be submitted by February 15, May 15, August 15, and November 15 of each year.
4. The permittee shall submit temperature deviation (excursion) reports that identify all 3-hour blocks of time during which the average temperature of the exhaust gases the thermal incinerator

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Emissions Unit ID: **P342**

**Issued: To be entered upon final issuance**

exceeded the temperature limitation specified above.

This report does not waive the reporting requirements of OAC Rule 3745-15-06.

5. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month gallons of throughput limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative gallons of throughput levels.
6. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. an identification of each day during which the average hourly organic compound emissions exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
  - b. an identification of each day during which the organic compound emissions exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
7. These quarterly deviation (excursion) reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(2).
8. The permittee shall also submit annual reports which specifies the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

**E. Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.I of these terms and conditions shall be determined in accordance with the following method(s):
  - a. Emission Limitation- Organic compound emissions shall not exceed 8 pounds per hour and 40 pounds per day.  
  
Applicable Compliance Method- Compliance with these emission limitations shall be determined based upon the records required in section C.1.e of these terms and conditions. If required, the permittee shall demonstrate compliance with these emission limitations through tests performed in accordance with Method 25, 25A or 18 of 40 CFR Part 60, Appendix A.
  - b. Emission Limitation- Organic compound emissions shall not exceed 0.002 ton per year.

**Akzo Nobel Coatings Inc**  
**PTI**  
**Issue**

**Emissions ID: 0125040064**

**Emissions Unit ID: P342**

**Akzo**

**PTI**

Emissions Unit ID: **P342**

**Issued: To be entered upon final issuance**

Applicable Compliance Method-

Compliance with these emission limitations shall be determined based upon the summation of the daily emissions calculated in the records required in section C.1.e of these terms and conditions.

- c. Emission Limitation: OC emissions from this emissions unit shall not exceed 0.002 ton/year, as a rolling, 12-month summation.

Applicable Compliance Method: Compliance with these emission limitations shall be determined based upon the summation of the daily emissions calculated in the records required in section C.1.e of these terms and conditions.

**F. Miscellaneous Requirements**

None

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PTI

Emissions Unit ID: P343

Issued: To be entered upon final issuance

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

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

1. The specific operations(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 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>
P343 - Vortisiv filtration unit (V-2) controlled by a thermal incinerator	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 0.002 ton per year.  Compliance with this rule also includes compliance with the requirements of OAC rules 3745-21-07(G)(2) and 3745-35-07(B).
	OAC rule 3745-21-07(G)(2)	OC emissions shall not exceed 8 pounds per hour and 40 pounds per day.
	OAC rule 3745-35-07(B)	OC*emissions from this emissions unit shall not exceed 0.002 ton/year, as a rolling, 12-month summation.  See A.2.a, B.1 and B.3 and C.1 thru C.3.  *Assume all HAP and VOC emissions are OC emissions.

**2. Additional Terms and Conditions**

- 2.a The thermal incinerator controlling VOC emissions from this emissions unit shall operate with a minimum control efficiency of 97.55%, by weight, for VOC emissions.
- 2.b The emissions from the Filtration Units, emissions units P342 through P344, shall not exceed the following:

**Akzo Nobel Coatings Inc**  
**PTI**  
**Issue**

**Emissions ID: 0125040064**

Organic Compounds (OC)

0.002 ton/year

Emissions Unit ID: **P343**

Akzo

PTI

Emissions Unit ID: P343

Issued: To be entered upon final issuance

## B. Operational Restrictions

1. The Filtration Units are located in the Plastisol Large Batch Production Area. The maximum rolling twelve (12) month coatings production rate for the Filtration Units, emissions units P342 through P344, shall be limited to 975,000 gallons. This limit is the sum of the Plastisol Large Batch Production Area, limited to 843,000 gallons of coating per rolling twelve months, and the Plastisol Small Batch Portable Production Area, limited to 132,000 gallons of coating per rolling twelve months. In order to ensure federal enforceability, for the first twelve calendar months of operation, this facility shall not exceed the following coatings production rate limits for the specific time period.

For Plastisol Large Batch Production Area:

<u>Month</u>	<u>Total Throughput (gallons)</u>
1	65,000
1-2	145,000
1-3	235,000
1-4	325,000
1-5	415,000
1-6	510,000
1-7	605,000
1-8	700,000
1-9	780,000
1-10	845,000
1-11	910,000
1-12	975,000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual throughput limitation shall be based upon a rolling, 12-month summation of the throughput.

2. 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 said equipment, must be accompanied by the shutdown of the associated air pollution source(s).
3. The average temperature of the exhaust gases from the thermal incinerator, for any 3-hour block of time, shall not be less than 1350°F.

## C. Monitoring and/or Recordkeeping Requirements

**Issued: To be entered upon final issuance**

1. This facility shall maintain daily records which list the following information for products filtered in the Filtration Units (emissions units P342 through P344):
  - a. the number of gallons of product filtered in each emissions unit;
  - b. the production area product filtered;
  - c. the total hours of daily operation of each emissions unit;
  - d. total gallons filtered in the Plastisol Large Batch Production Area;
  - e. calculations showing the hourly and daily OC emissions from each emissions unit;
  - f. calculations showing the hourly OC emissions from each emissions unit to the Large Batch Fugitive Stack; Note: this facility shall utilize a Filtration Units OC Large Batch Fugitive Stack emission factor of 3.40 E-07 lbs. OC/gal. of product produced in the Plastisol Large Batch Production Area and Plastisol Small Batch Portable Production Area for emissions units P342 through P344, unless otherwise approved in writing by Ohio EPA, CDO;
  - g. calculations showing the hourly OC emissions from each emissions unit to the Truck Bay Doors; Note: this facility shall utilize a Filtration Units OC Truck Bay Door emission factor of 2.08 E-08 lbs. OC/gal. of product produced in the Plastisol Large Batch Production Area and Plastisol Small Batch Portable Production Area for emissions units P342 through P344, unless otherwise approved in writing by Ohio EPA, CDO; and
  - h. calculations showing the hourly OC emissions from the emissions unit to the Conc/Ox Stack.

Note: this facility shall utilize a Filtration Units OC Conc/Ox emission factor of 2.51 E-06 lbs. OC/gal. of product produced in the Plastisol Large Batch Production Area and Plastisol Small Batch Portable Production Area for emissions units P342 through P344, unless otherwise approved in writing by Ohio EPA, CDO.

2. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the temperature of the exhaust gases from the thermal incinerator when the emissions unit is in operation. Units shall be in degree Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within  $\pm 1$  percent of the temperature being measured at  $\pm 5$  degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each day:

- a. the average temperature of the exhaust gases from the thermal incinerator during each of the 8 3-hour blocks of time during the day; and
  - b. a log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
3. The permittee shall maintain monthly records of the following information:
- a. the total number of gallons of throughput for each month;
  - b. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of gallons of throughput; and
  - c. the rolling, 12-month summation of OC emissions (summation of C.1.e thru g).

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative gallons of throughput for each calendar month.

4. The permittee shall recalculate, on a quarterly basis, the worst case controlled VOC emission rate, in pounds per gallon of resin. This VOC emission rate shall be calculated using methodology consistent with that employed in the permit application submitted for this emissions unit on March 17, 2003 and shall be calculated using an overall control efficiency determined during the most recent emissions testing which demonstrated that the emissions unit was in compliance.

#### **D. Reporting Requirements**

1. This facility shall notify CDO of any exceedance(s) of the permitted emissions limits and/or production rate. A report of the exceedance(s), including any corrective actions taken to correct exceedance(s) shall be sent to CDO within thirty (30) days following the end of the calendar month in which the violation occurred.
2. In accordance with OAC Rule 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported within one half hour to the Ohio EPA, Central District Office.
3. This facility shall submit quarterly reports to the CDO that provide the total OC emissions for Filtration Units (emissions units P342 through P344), and which document any exceedance(s) of the permitted production rate and/or emissions limits, hourly and/or daily, for the previous three (3) calendar months (October 1 through December 31, January 1 through March 31, April 1

through June 30, and July 1 through September 30, respectively). The reports shall be submitted by February 15, May 15, August 15, and November 15 of each year.

4. The permittee shall submit temperature deviation (excursion) reports that identify all 3-hour blocks of time during which the average temperature of the exhaust gases the thermal incinerator exceeded the temperature limitation specified above.

This report does not waive the reporting requirements of OAC Rule 3745-15-06.

5. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month gallons of throughput limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative gallons of throughput levels.
6. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. an identification of each day during which the average hourly organic compound emissions exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
  - b. an identification of each day during which the organic compound emissions exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
7. These quarterly deviation (excursion) reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(2).
8. The permittee shall also submit annual reports which specifies the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

#### **E. Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.I of these terms and conditions shall be determined in accordance with the following method(s):
  - a. Emission Limitation- Organic compound emissions shall not exceed 8 pounds per hour and 40 pounds per day.

Applicable Compliance Method- Compliance with these emission limitations shall be determined based upon the records required in section C.1.e of these terms and conditions. If required, the permittee shall demonstrate compliance with these emission limitations

Emissions Unit ID: **P343**

through tests performed in accordance with Method 25, 25A or 18 of 40 CFR Part 60, Appendix A.

- b. Emission Limitation- Organic compound emissions shall not exceed 0.002 ton per year.

Applicable Compliance Method-

Compliance with these emission limitations shall be determined based upon the summation of the daily emissions calculated in the records required in section C.1.e of these terms and conditions.

- c. Emission Limitation: OC emissions from this emissions unit shall not exceed 0.002 ton/year, as a rolling, 12-month summation.

Applicable Compliance Method: Compliance with these emission limitations shall be determined based upon the summation of the daily emissions calculated in the records required in section C.1.e of these terms and conditions.

## **F. Miscellaneous Requirements**

None

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## PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

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

1. The specific operations(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 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>
P344 - Vortisiv filtration unit (V-3) controlled by a thermal incinerator	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 0.002 ton per year.  Compliance with this rule also includes compliance with the requirements of OAC rules 3745-21-07(G)(2) and 3745-35-07(B).
	OAC rule 3745-21-07(G)(2)	OC emissions shall not exceed 8 pounds per hour and 40 pounds per day.
	OAC rule 3745-35-07(B)	OC*emissions from this emissions unit shall not exceed 0.002 ton/year, as a rolling, 12-month summation.
		See A.2.a, B.1 and B.3 and C.1 thru C.3.
		*Assume all HAP and VOC emissions are OC emissions.

### 2. Additional Terms and Conditions

- 2.a The thermal incinerator controlling VOC emissions from this emissions unit shall operate with a minimum control efficiency of 97.55%, by weight, for VOC emissions.
- 2.b The emissions from the Filtration Units, emissions units P342 through P344, shall not exceed the following:

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Emissions Unit ID: **P344**

Organic Compounds (OC)

0.002 ton/year

Akzo

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Emissions Unit ID: P344

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## B. Operational Restrictions

1. The Filtration Units are located in the Platisol Large Batch Production Area. The maximum rolling twelve (12) month coatings production rate for the Filtration Units, emissions units P342 through P344, shall be limited to 975,000 gallons. This limit is the sum of the Platisol Large Batch Production Area, limited to 843,000 gallons of coating per rolling twelve months, and the Platisol Small Batch Portable Production Area, limited to 132,000 gallons of coating per rolling twelve months. In order to ensure federal enforceability, for the first twelve calendar months of operation, this facility shall not exceed the following coatings production rate limits for the specific time period.

For Platisol Large Batch Production Area:

<u>Month</u>	<u>Total Throughput (gallons)</u>
1	65,000
1-2	145,000
1-3	235,000
1-4	325,000
1-5	415,000
1-6	510,000
1-7	605,000
1-8	700,000
1-9	780,000
1-10	845,000
1-11	910,000
1-12	975,000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual throughput limitation shall be based upon a rolling, 12-month summation of the throughput.

2. 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 said equipment, must be accompanied by the shutdown of the associated air pollution source(s).
3. The average temperature of the exhaust gases from the thermal incinerator, for any 3-hour block of time, shall not be less than 1350°F.

## C. Monitoring and/or Recordkeeping Requirements

1. This facility shall maintain daily records which list the following information for products filtered in the Filtration Units (emissions units P342 through P344):
  - a. the number of gallons of product filtered in each emissions unit;
  - b. the production area product filtered;
  - c. the total hours of daily operation of each emissions unit;
  - d. total gallons filtered in the Plastisol Large Batch Production Area;
  - e. calculations showing the hourly and daily OC emissions from each emissions unit;
  - f. calculations showing the hourly OC emissions from each emissions unit to the Large Batch Fugitive Stack; Note: this facility shall utilize a Filtration Units OC Large Batch Fugitive Stack emission factor of 3.40 E-07 lbs. OC/gal. of product produced in the Plastisol Large Batch Production Area and Plastisol Small Batch Portable Production Area for emissions units P342 through P344, unless otherwise approved in writing by Ohio EPA, CDO;
  - g. calculations showing the hourly OC emissions from each emissions unit to the Truck Bay Doors; Note: this facility shall utilize a Filtration Units OC Truck Bay Door emission factor of 2.08 E-08 lbs. OC/gal. of product produced in the Plastisol Large Batch Production Area and Plastisol Small Batch Portable Production Area for emissions units P342 through P344, unless otherwise approved in writing by Ohio EPA, CDO; and
  - h. calculations showing the hourly OC emissions from the emissions unit to the Conc/Ox Stack.

Note: this facility shall utilize a Filtration Units OC Conc/Ox emission factor of 2.51 E-06 lbs. OC/gal. of product produced in the Plastisol Large Batch Production Area and Plastisol Small Batch Portable Production Area for emissions units P342 through P344, unless otherwise approved in writing by Ohio EPA, CDO.

2. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the temperature of the exhaust gases from the thermal incinerator when the emissions unit is in operation. Units shall be in degree Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within  $\pm 1$  percent of the temperature being measured at  $\pm 5$  degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each day:

- a. the average temperature of the exhaust gases from the thermal incinerator during each of the 8 3-hour blocks of time during the day; and
  - b. a log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
3. The permittee shall maintain monthly records of the following information:
- a. the total number of gallons of throughput for each month;
  - b. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of gallons of throughput; and
  - c. the rolling, 12-month summation of OC emissions (summation of C.1.e thru g).

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative gallons of throughput for each calendar month.

4. The permittee shall recalculate, on a quarterly basis, the worst case controlled VOC emission rate, in pounds per gallon of resin. This VOC emission rate shall be calculated using methodology consistent with that employed in the permit application submitted for this emissions unit on March 17, 2003 and shall be calculated using an overall control efficiency determined during the most recent emissions testing which demonstrated that the emissions unit was in compliance.

#### **D. Reporting Requirements**

1. This facility shall notify CDO of any exceedance(s) of the permitted emissions limits and/or production rate. A report of the exceedance(s), including any corrective actions taken to correct exceedance(s) shall be sent to CDO within thirty (30) days following the end of the calendar month in which the violation occurred.
2. In accordance with OAC Rule 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported within one half hour to the Ohio EPA, Central District Office.
3. This facility shall submit quarterly reports to the CDO that provide the total OC emissions for Filtration Units (emissions units P342 through P344), and which document any exceedance(s) of the permitted production rate and/or emissions limits, hourly and/or daily, for the previous three (3) calendar months (October 1 through December 31, January 1 through March 31, April 1 through June 30, and July 1 through September 30, respectively). The reports shall be submitted

by February 15, May 15, August 15, and November 15 of each year.

4. The permittee shall submit temperature deviation (excursion) reports that identify all 3-hour blocks of time during which the average temperature of the exhaust gases the thermal incinerator exceeded the temperature limitation specified above.

This report does not waive the reporting requirements of OAC Rule 3745-15-06.

5. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month gallons of throughput limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative gallons of throughput levels.
6. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. an identification of each day during which the average hourly organic compound emissions exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
  - b. an identification of each day during which the organic compound emissions exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
7. These quarterly deviation (excursion) reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(2).
8. The permittee shall also submit annual reports which specifies the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

#### **E. Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.I of these terms and conditions shall be determined in accordance with the following method(s):
  - a. Emission Limitation- Organic compound emissions shall not exceed 8 pounds per hour and 40 pounds per day.

Applicable Compliance Method- Compliance with these emission limitations shall be determined based upon the records required in section C.1.e of these terms and conditions. If required, the permittee shall demonstrate compliance with these emission limitations through tests performed in accordance with Method 25, 25A or 18 of 40 CFR Part 60,

Appendix A.

- b. Emission Limitation- Organic compound emissions shall not exceed 0.002 ton per year.

Applicable Compliance Method-

Compliance with these emission limitations shall be determined based upon the summation of the daily emissions calculated in the records required in section C.1.e of these terms and conditions.

- c. Emission Limitation: OC emissions from this emissions unit shall not exceed 0.002 ton/year, as a rolling, 12-month summation.

Applicable Compliance Method: Compliance with these emission limitations shall be determined based upon the summation of the daily emissions calculated in the records required in section C.1.e of these terms and conditions.

**F. Miscellaneous Requirements**

None

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## PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

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

1. The specific operations(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 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>
P345 - Portable tank washer II controlled by a thermal oxidizer	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 0.26 pounds per hour and 0.1 ton per year.  Compliance with this rule also includes compliance with the requirements of OAC rule 3745-35-07(B).
	OAC rule 3745-21-09(O)	The requirements specified by this rule are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-35-07(B)	OC*emissions from this emissions unit shall not exceed 0.1 ton per year., as a rolling, 12-month summation.  See A.2.a, B.1 and B.2 and C.1 thru C.3.  *Assume all HAP and VOC emissions are OC emissions.

### 2. Additional Terms and Conditions

- 2.a The thermal incinerator controlling VOC emissions from this emissions unit shall operate with a minimum control efficiency of 97.55%, by weight, for VOC emissions.

**B. Operational Restrictions**

1. The maximum rolling twelve (12) month rate for the Portable Tank Washer II, emissions unit P345, shall be limited to 234,000 gallons. In order to ensure federal enforceability, for the first twelve calendar months of operation, this facility shall not exceed the following limits for the specific time period:

<u>Month</u>	<u>Total Throughput (gallons)</u>
1	19,500
1-2	39,000
1-3	58,500
1-4	78,000
1-5	97,500
1-6	117,000
1-7	136,500
1-8	156,000
1-9	175,500
1-10	195,000
1-11	214,500
1-12	234,000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual throughput limitation shall be based upon a rolling, 12-month summation of the throughput.

2. The average temperature of the exhaust gases from the thermal incinerator, for any 3-hour block of time, shall not be less than 1350°F.

**C. Monitoring and/or Recordkeeping Requirements**

1. This facility shall maintain daily records which list the following information for emissions unit P345:
  - a. the number of gallons used in tank cleanings;
  - b. the total hours of daily operation of this emissions unit;
  - c. calculations showing the hourly OC emissions from each emissions unit;
  - d. calculations showing the hourly OC emissions from Tank Cleaning to the Small Batch

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Emissions Unit ID: **P345**

**Issued: To be entered upon final issuance**

Fugitive Stack; Note: this facility shall utilize a Portable Tank Washer II Small Batch Fugitive Stack emission factor of 4.27 E-04 lb. VOC/gal. for emission unit P345, unless otherwise approved in writing by Ohio EPA, CDO;

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- e. calculations showing the hourly OC emissions from Tank Cleaning to the Truck Bay Doors. Note: This facility shall utilize a Portable Tank Washer II Truck Bay Door emission factor of 1.74 E-05 lbs. VOC/gal. for emission unit P345, unless otherwise approved in writing by Ohio EPA, CDO; and
  - f. calculations showing the hourly OC emissions from Tank Cleaning to the Conc/Ox Stack. Note: This facility shall utilize a Portable Tank Washer II Conc/Ox emission factor of 3.13 E-07 lbs. VOC/gal. for emission unit P345, unless otherwise approved in writing by Ohio EPA, CDO.
2. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the temperature of the exhaust gases from the thermal incinerator when the emissions unit is in operation. Units shall be in degree Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within  $\pm 1$  percent of the temperature being measured at  $\pm 5$  degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each day:

- a. the average temperature of the exhaust gases from the thermal incinerator during each of the 8 3-hour blocks of time during the day; and
  - b. a log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
3. The permittee shall maintain monthly records of the following information:
    - a. the total number of gallons of throughput for each month;
    - b. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of gallons of throughput; and
    - c. the rolling, 12-month summation of OC emissions (summation of C.1.d thru f).

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative gallons of throughput for each calendar month.

4. The permittee shall recalculate, on a quarterly basis, the worst case controlled VOC emission rate, in pounds per gallon of resin. This VOC emission rate shall be calculated using methodology

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consistent with that employed in the permit application submitted for this emissions unit on March 17, 2003 and shall be calculated using an overall control efficiency determined during the most recent emissions testing which demonstrated that the emissions unit was in compliance.

#### **D. Reporting Requirements**

1. This facility shall notify CDO of any exceedance(s) of the permitted emissions limits and/or production rate. A report of the exceedance(s), including any corrective actions taken to correct exceedance(s) shall be sent to CDO within thirty (30) days following the end of the calendar month in which the violation occurred.
2. In accordance with OAC Rule 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported within one half hour to the Ohio EPA, Central District Office.
3. This facility shall submit quarterly reports to the CDO that provide the total OC emissions for Portable tank washer II (emissions unit P345), and which document any exceedance(s) of the permitted production rate and/or emissions limits, hourly and/or daily, for the previous three (3) calendar months (October 1 through December 31, January 1 through March 31, April 1 through June 30, and July 1 through September 30, respectively). The reports shall be submitted by February 15, May 15, August 15, and November 15 of each year.
4. The permittee shall submit temperature deviation (excursion) reports that identify all 3-hour blocks of time during which the average temperature of the exhaust gases the thermal incinerator exceeded the temperature limitation specified above.

This report does not waive the reporting requirements of OAC Rule 3745-15-06.

5. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month gallons of throughput limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative gallons of throughput levels.
6. The permittee shall submit deviation (excursion) reports which include an identification of each day during which the average hourly organic compound emissions exceeded 0.26 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
7. These quarterly deviation (excursion) reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(2).
8. The permittee shall also submit annual reports which specifies the total VOC emissions from this

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emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

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**E. Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.I of these terms and conditions shall be determined in accordance with the following method(s):
  - a. Emission Limitation- Organic compound emissions shall not exceed 0.26 pounds per hour  
  
Applicable Compliance Method- Compliance with these emission limitations shall be determined based upon the records required in section C.1.c of these terms and conditions. If required, the permittee shall demonstrate compliance with these emission limitations through tests performed in accordance with Method 25, 25A or 18 of 40 CFR Part 60, Appendix A.
  - b. Emission Limitation- Organic compound emissions shall not exceed 0.1 ton per year.  
  
Applicable Compliance Method- Compliance with these emission limitations shall be determined based upon the summation of the emissions calculated in the records required in section C.1.c of these terms and conditions.
  - c. Emission Limitation- OC emissions from this emissions unit shall not exceed 0.1 ton per year., as a rolling, 12-month summation.  
  
Applicable Compliance Method- Compliance with these emission limitations shall be determined based upon the summation of the emissions calculated in the records required in section C.1.c of these terms and conditions.

**F. Miscellaneous Requirements**

None