State of Ohio Environmental Protection Agency

RE: FINAL PERMIT TO INSTALL **CERTIFIED MAIL**
FRANKLIN COUNTY

Street Address:
122 S. Front Street

Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329

Mailing Address:
Lazarus Gov. Center
P.O. Box 1049

Application No: 01-01323
Fac ID: 0125040064
DATE: 3/28/2006

Akzo Nobel Coatings Inc
Tracy De Pugh
1313 Windsor Avenue
Columbus, OH 432160489

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

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.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, Ohio 43215

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: **USEPA** **CDO**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install	**Issue Date: 3/28/2006**
Terms and Conditions	**Effective Date: 3/28/2006**

FINAL PERMIT TO INSTALL 01-01323

Application Number:	01-01323
Facility ID:	0125040064
Permit Fee:	**$800**
Name of Facility:	Akzo Nobel Coatings Inc
Person to Contact:	Tracy De Pugh
Address:	1313 Windsor Avenue Columbus, OH 432160489

Location of proposed air contaminant source(s) [emissions unit(s)]:
1313 Windsor Avenue
Columbus, **Ohio**

Description of proposed emissions unit(s):
4 thin down tanks.

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

Joseph P. Koncelik

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 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 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

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

Pollutant	Tons Per Year
PM	0.02
VOC	0.66

Emissions Unit ID: **P218**

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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P218 - 4000 gallon thindown tank w/ 60HP agitator (TD-224) controlled by a thermal incinerator and fabric filter	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) shall not exceed 0.018 pound per hour and 0.0014 grains per dry standard cubic foot. Particulate emissions (PE) shall not exceed 0.02 ton per year. Organic compound (OC) emissions shall not exceed 0.66 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 3745-35-07(B) (synthetic minor to avoid Title V)	See A.2.a-c.
	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.

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 0.0014 grains per dry standard cubic foot.

2.c The emissions from the Large Batch Production Area, Premix and Thindown Tanks, (emissions units P201 through P224, P226 through P255, P346 and P347) shall not exceed the following:

Organic Compounds (OC) from Premix Tanks	1.37 tons/year
Organic Compounds (OC) from Thindown Tanks	0.66 ton/year
Particulate Matter (PM) from Premix Tanks	0.68 ton/year
Particulate Matter (PM) from Thindown Tanks	0.02 ton/year.

B. Operational Restrictions

1. The maximum rolling twelve (12) month coatings production rate for the Large Batch Production Area (emissions units P201 through P224, P226 through P255, P346 and P347) shall be limited to 9,000,000 gallons. The production emissions will be assigned to the day the coating is drained from the letdown tank (corresponds to filling report). The facility is an existing facility and has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12 month summation of the coating production usage, upon issuance of this permit.

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 Record keeping Requirements

1. This facility shall maintain daily records which list the following information for products produced in the Large Batch Production Area (emissions units P201 through P224, P226 through P255, P346 and P347):

a. the number of gallons of product produced in the 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 8.376 E-05 lbs. OC/gal. of product produced in the Large Batch Production Area for emissions units, P201, and P203 through P211 unless otherwise approved in writing by Ohio EPA, CDO. Additionally, this facility shall utilize a Thindown Tank OC Large Batch Fugitive Stack emission factor of 1.364 E-5 lbs. OC/gal. of product produced in the Large Batch Production Area for emissions units P202 , P212 through P224 , P226 through P255, P346 and P347 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 5.128 E-06 lbs. OC/gal. of product produced in the Large Batch Production Area for emissions units, P201, and P203 through P211 unless otherwise approved in writing by Ohio EPA, CDO. Additionally, this facility shall utilize a Thindown Tank OC Truck Bay Door emission factor of 8.3524 E-7 lbs. OC/gal. of product produced in the Large Batch Production Area for emissions units P202 , P212 through P224 , P226 through P255, P346 and P347 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 4.698 E-05 lbs. OC/gal. of product produced in the Large Batch Production Area for emissions units, P201, and P203 through P211 unless otherwise approved in writing by Ohio EPA, CDO. Additionally, this facility shall utilize a Thindown Tank OC Conc/Ox emission factor of 1.047 E-4 lbs. OC/gal. of product produced in the Large Batch Production Area for emissions units P202 , P212 through P224 , P226 through P255, P346 and P347 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 4.93 E-05 lbs. PM/gal. of product produced in the Large Batch Production Area for emissions units, P201, and P203 through P211 unless otherwise approved in writing by Ohio EPA, CDO. Additionally, this facility shall utilize a Thindown tank PM Large Batch Fugitive Stack emission factor of 1.47 E-6 lbs PM/gal of product produced in the Large Batch Production Area for emission units P202 , P212 through P224, P226 through P255, P346 and P347 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 3.02 E-6 lbs. PM/gal. of product produced in the Large Batch Production Area for emissions units, P201, and P203 through P211 unless otherwise approved in writing by Ohio EPA, CDO. Additionally, this facility shall utilize a Thindown Tank PM Truck Bay Door emission factor of 9.02 E-8 lbs PM/gal of product produced in the Large Batch Production Area for emission units P202 , P212 through P224 , P226 through P255, P346 and P347 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 ± 1 percent of the temperature being measured at ± 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. the rolling, 12-month summation of OC emissions (summation of C.1.e thru g).

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 product. This VOC emission rate shall be calculated using methodology consistent with that employed in the permit application submitted for this emissions unit on September 26, 2005 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. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month gallons of throughput limitation.

   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).

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 Thindown Tanks, emissions units P202 , P212 through P224 , P226 through P255, P346 and P347, the total OC emissions for the Large Batch Premix Tanks, emissions units P201, and P203 through P211, total PM emissions for the Large Batch Production Area, emissions units P201 through P224, P226 through P255, P346 and P347, 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 deviation (excursion) reports which include the following

information:

a. an identification of all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was below the average temperature observed during the most recent performance test that demonstrated the emissions unit was in compliance; and

b. any record of downtime for the capture (collection) system, control device, and monitoring equipment, when the emissions unit was in operation.

These reports are due by the date described in Part 1- General Terms and Conditions of this permit under section (A).

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

5. The permittee shall notify the Ohio EPA Central District Office in writing of any daily record showing that the particulate filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Central District Office within 30 days after the event occurs.

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.

   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).

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.

   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.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 0.66 ton per year.

      Applicable Compliance Method- Compliance with this emission limitation 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- Particulate emissions (PE) shall not exceed 0.02 ton per year.

      Applicable Compliance Method- Compliance with this emission limitation 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 0.018 pound per hour.

      Applicable Compliance Method: Compliance with this emission limitation 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: The baghouse controlling particulate emissions from this emissions unit shall operate with a grain loading of less than 0.0014 grains per dry standard cubic foot.

Applicable Compliance Method: 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.

g. Emission limitation: The emissions from the Large Batch Production Area, Premix and Thindown Tanks, (emissions units P201 through P224, P226 through P255, P346 and P347) shall not exceed the following:

Organic Compounds (OC) from Premix Tanks	1.37 tons/year
Organic Compounds (OC) from Thindown Tanks	0.66 ton/year
Particulate Matter (PM) from Premix Tanks	0.68 ton/year
Particulate Matter (PM) from Thindown Tanks	0.02 ton/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 of these terms and conditions.

F. Miscellaneous Requirements

None

Emissions Unit ID: **P224**

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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P224 - 2000 gallon thindown tank with 40 HP agitator (TD-244) controlled by a thermal incinerator and fabric filter	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) shall not exceed 0.009 pound per hour and 0.0014 grains per dry standard cubic foot. Particulate emissions (PE) shall not exceed 0.02 ton per year. Organic compound (OC) emissions shall not exceed 0.66 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 3745-35-07(B) (synthetic minor to avoid Title V)	See A.2.a-c.
	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.

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 0.0014 grains per dry standard cubic foot.

2.c The emissions from the Large Batch Production Area, Premix and Thindown Tanks, (emissions units P201 through P224, P226 through P255, P346 and P347) shall not exceed the following:

Organic Compounds (OC) from Premix Tanks	1.37 tons/year
Organic Compounds (OC) from Thindown Tanks	0.66 ton/year
Particulate Matter (PM) from Premix Tanks	0.68 ton/year
Particulate Matter (PM) from Thindown Tanks	0.02 ton/year

B. Operational Restrictions

1. The maximum rolling twelve (12) month coatings production rate for the Large Batch Production Area (emissions units P201 through P224, P226 through P255, P346 and P347) shall be limited to 9,000,000 gallons. The production emissions will be assigned to the day the coating is drained from the letdown tank (corresponds to filling report). The facility is an existing facility and has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12 month summation of the coating production usage, upon issuance of this permit.

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

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 Record keeping Requirements

1. This facility shall maintain daily records which list the following information for products produced in the Large Batch Production Area (emissions units P201 through P224, P226 through P255, P346 and P347):

a. the number of gallons of product produced in the 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 8.376 E-05 lbs. OC/gal. of product produced in the Large Batch Production Area for emissions units, P201, and P203 through P211 unless otherwise approved in writing by Ohio EPA, CDO. Additionally, this facility shall utilize a Thindown Tank OC Large Batch Fugitive Stack emission factor of 1.364 E-5 lbs. OC/gal. of product produced in the Large Batch Production Area for emissions units P202 , P212 through P224 , P226 through P255, P346 and P347 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 5.128 E-06 lbs. OC/gal. of product produced in the Large Batch Production Area for emissions units, P201, and P203 through P211 unless otherwise approved in writing by Ohio EPA, CDO. Additionally, this facility shall utilize a Thindown Tank OC Truck Bay Door emission factor of 8.3524 E-7 lbs. OC/gal. of product produced in the Large Batch Production Area for emissions units P202 , P212 through P224 , P226 through P255, P346 and P347 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 4.698 E-05 lbs. OC/gal. of product produced in the Large Batch Production Area for emissions units, P201, and P203 through P211 unless otherwise approved in writing by Ohio EPA, CDO. Additionally, this facility shall utilize a Thindown Tank OC Conc/Ox emission factor of 1.047 E-4 lbs. OC/gal. of product produced in the Large Batch Production Area for emissions units P202 , P212 through P224 , P226 through P255, P346 and P347 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 4.93 E-05 lbs. PM/gal. of product produced in the Large Batch Production Area for emissions units, P201, and P203 through P211 unless otherwise approved in writing by Ohio EPA, CDO. Additionally, this facility shall utilize a Thindown tank PM Large Batch Fugitive Stack emission factor of 1.47 E-6 lbs PM/gal of product produced in the Large Batch Production Area for emission units P202 , P212 through P224 , P226 through P255, P346 and P347 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 3.02 E-6 lbs. PM/gal. of product produced in the Large Batch Production Area for emissions units, P201, and P203 through P211 unless otherwise approved in writing by Ohio EPA, CDO. Additionally, this facility shall utilize a Thindown Tank PM Truck Bay Door emission factor of 9.02 E-8 lbs PM/gal of product produced in the Large Batch Production Area for emission units P202 , P212 through P224, P226 through P255, P346 and P347 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 ± 1 percent of the temperature being measured at ± 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. the rolling, 12-month summation of OC emissions (summation of C.1.e thru g).

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 product. This VOC emission rate shall be calculated using methodology consistent with that employed in the permit application submitted for this emissions unit on September 26, 2005 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. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month gallons of throughput limitation.

   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).

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 Thindown Tanks, emissions units P202 , P212 through P224 , P226 through P255, P346 and P347, the total OC emissions for the Large Batch Premix Tanks, emissions units P201, and P203 through P211, total PM emissions for the Large Batch Production Area, emissions units P201 through P224, P226 through P255, P346 and P347, 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 deviation (excursion) reports which include the following information:

   a. an identification of all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was below the average temperature observed during the most recent performance test that demonstrated the emissions unit was in compliance; and

b. any record of downtime for the capture (collection) system, control device, and monitoring equipment, when the emissions unit was in operation.

These reports are due by the date described in Part 1- General Terms and Conditions of this permit under section (A).

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

5. The permittee shall notify the Ohio EPA Central District Office in writing of any daily record showing that the particulate filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Central District Office within 30 days after the event occurs.

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.

   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).

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.

   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.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 0.66 ton per year.

      Applicable Compliance Method- Compliance with this emission limitation 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- Particulate emissions (PE) shall not exceed 0.02 ton per year.

      Applicable Compliance Method- Compliance with this emission limitation 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 0.009 pound per hour.

      Applicable Compliance Method: Compliance with this emission limitation 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: The baghouse controlling particulate emissions from this emissions unit shall operate with a grain loading of less than 0.0014 grains per dry standard cubic foot.

Applicable Compliance Method: 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.

g. Emission limitation: The emissions from the Large Batch Production Area, Premix and Thindown Tanks, (emissions units P201 through P224, P226 through P255, P346 and P347) shall not exceed the following:

Organic Compounds (OC) from Premix Tanks	1.37 tons/year
Organic Compounds (OC) from Thindown Tanks	0.66 ton/year
Particulate Matter (PM) from Premix Tanks	0.68 ton/year
Particulate Matter (PM) from Thindown Tanks	0.02 ton/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 of these terms and conditions.

F. Miscellaneous Requirements

None

Emissions Unit ID: **P346**

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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P346 - 500 gallon thindown tank with 25 HP agitator (TD-287) controlled by a thermal incinerator and fabric filter	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) shall not exceed 0.002 pound per hour and 0.0014 grains per dry standard cubic foot. Particulate emissions (PE) shall not exceed 0.02 ton per year. Organic compound (OC) emissions shall not exceed 0.66 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 3745-35-07(B) (synthetic minor to avoid Title V)	See A.2.a-c.
	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.

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 0.0014 grains per dry standard cubic foot.

2.c The emissions from the Large Batch Production Area, Premix and Thindown Tanks, (emissions units P201 through P224, P226 through P255, P346 and P347) shall not exceed the following:

Organic Compounds (OC) from Premix Tanks	1.37 tons/year
Organic Compounds (OC) from Thindown Tanks	0.66 ton/year
Particulate Matter (PM) from Premix Tanks	0.68 ton/year
Particulate Matter (PM) from Thindown Tanks	0.02 ton/year

B. Operational Restrictions

1. The maximum rolling twelve (12) month coatings production rate for the Large Batch Production Area (emissions units P201 through P224, P226 through P255, P346 and P347) shall be limited to 9,000,000 gallons. The production emissions will be assigned to the day the coating is drained from the letdown tank (corresponds to filling report). The facility is an existing facility and has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12 month summation of the coating production usage, upon issuance of this permit.

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

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 Record keeping Requirements

1. This facility shall maintain daily records which list the following information for products produced in the Large Batch Production Area (emissions units P201 through P224, P226 through P255, P346 and P347):

a. the number of gallons of product produced in the 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 8.376 E-05 lbs. OC/gal. of product produced in the Large Batch Production Area for emissions units, P201, and P203 through P211 unless otherwise approved in writing by Ohio EPA, CDO. Additionally, this facility shall utilize a Thindown Tank OC Large Batch Fugitive Stack emission factor of 1.364 E-5 lbs. OC/gal. of product produced in the Large Batch Production Area for emissions units P202 , P212 through P224 , P226 through P255, P346 and P347 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 5.128 E-06 lbs. OC/gal. of product produced in the Large Batch Production Area for emissions units, P201, and P203 through P211 unless otherwise approved in writing by Ohio EPA, CDO. Additionally, this facility shall utilize a Thindown Tank OC Truck Bay Door emission factor of 8.3524 E-7 lbs. OC/gal. of product produced in the Large Batch Production Area for emissions units P202 , P212 through P224 , P226 through P255, P346 and P347 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 4.698 E-05 lbs. OC/gal. of product produced in the Large Batch Production Area for emissions units, P201, and P203 through P211 unless otherwise approved in writing by Ohio EPA, CDO. Additionally, this facility shall utilize a Thindown Tank OC Conc/Ox emission factor of 1.047 E-4 lbs. OC/gal. of product produced in the Large Batch Production Area for emissions units P202 , P212 through P224 , P226 through P255, P346 and P347 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 4.93 E-05 lbs. PM/gal. of product produced in the Large Batch Production Area for emissions units, P201, and P203 through P211 unless otherwise approved in writing by Ohio EPA, CDO. Additionally, this facility shall utilize a Thindown tank PM Large Batch Fugitive Stack emission factor of 1.47 E-6 lbs PM/gal of product produced in the Large Batch Production Area for emission units P202 , P212 through P224, P226 through P255, P346 and P347 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 3.02 E-6 lbs. PM/gal. of product produced in the Large Batch Production Area for emissions units, P201, and P203 through P211 unless otherwise approved in writing by Ohio EPA, CDO. Additionally, this facility shall utilize a Thindown Tank PM Truck Bay Door emission factor of 9.02 E-8 lbs PM/gal of product produced in the Large Batch Production Area for emission units P202 , P212 through P224 , P226 through P255, P346 and P347 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 ± 1 percent of the temperature being measured at ± 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. the rolling, 12-month summation of OC emissions (summation of C.1.e thru g).

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 product. This VOC emission rate shall be calculated using methodology consistent with that employed in the permit application submitted for this emissions unit on September 26, 2005 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. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month gallons of throughput limitation.

   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).

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 Thindown Tanks, emissions units P202 , P212 through P224 , P226 through P255, P346 and P347, total OC emissions for the Large Batch Premix Tanks, emissions units P201, and P203 through P211, total PM emissions for the Large Batch Production Area, emissions units P201 through P224, P226 through P255, P346 and P347, 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 deviation (excursion) reports which include the following

information:

a. an identification of all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was below the average temperature observed during the most recent performance test that demonstrated the emissions unit was in compliance; and

b. any record of downtime for the capture (collection) system, control device, and monitoring equipment, when the emissions unit was in operation.

These reports are due by the date described in Part 1- General Terms and Conditions of this permit under section (A).

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

5. The permittee shall notify the Ohio EPA Central District Office in writing of any daily record showing that the particulate filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Central District Office within 30 days after the event occurs.

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.

   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).

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.

   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.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 0.66 ton per year.

      Applicable Compliance Method- Compliance with this emission limitation 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- Particulate emissions (PE) shall not exceed 0.02 ton per year.

      Applicable Compliance Method- Compliance with this emission limitation 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 0.002 pound per hour.

      Applicable Compliance Method: Compliance with this emission limitation 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: The baghouse controlling particulate emissions from this emissions unit shall operate with a grain loading of less than 0.0014 grains per dry standard cubic foot.

Applicable Compliance Method: 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.

g. Emission limitation: The emissions from the Large Batch Production Area, Premix and Thindown Tanks, (emissions units P201 through P224, P226 through P255, P346 and P347) shall not exceed the following:

Organic Compounds (OC) from Premix Tanks	1.37 tons/year
Organic Compounds (OC) from Thindown Tanks	0.66 ton/year
Particulate Matter (PM) from Premix Tanks	0.68 ton/year
Particulate Matter (PM) from Thindown Tanks	0.02 ton/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 of these terms and conditions.

F. Miscellaneous Requirements

None

Emissions Unit ID: **P347**

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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P347 - 6000 gallon thindown tank with 75 HP agitator (TD-232) controlled by a thermal incinerator and fabric filter	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) shall not exceed 0.027 pound per hour and 0.0014 grains per dry standard cubic foot. Particulate emissions (PE) shall not exceed 0.02 ton per year. Organic compound (OC) emissions shall not exceed 0.66 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 3745-35-07(B) (synthetic minor to avoid Title V)	See A.2.a-c.
	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.

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 0.0014 grains per dry standard cubic foot.

2.c The emissions from the Large Batch Production Area, Premix and Thindown Tanks, (emissions units P201 through P224, P226 through P255, P346 and P347) shall not exceed the following:

Organic Compounds (OC) from Premix Tanks	1.37 tons/year
Organic Compounds (OC) from Thindown Tanks	0.66 ton/year
Particulate Matter (PM) from Premix Tanks	0.68 ton/year
Particulate Matter (PM) from Thindown Tanks	0.02 ton/year

B. Operational Restrictions

1. The maximum rolling twelve (12) month coatings production rate for the Large Batch Production Area (emissions units P201 through P224, P226 through P255, P346 and P347) shall be limited to 9,000,000 gallons. The production emissions will be assigned to the day the coating is drained from the letdown tank (corresponds to filling report). The facility is an existing facility and has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12 month summation of the coating production usage, upon issuance of this permit.

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

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 Record keeping Requirements

1. This facility shall maintain daily records which list the following information for products produced in the Large Batch Production Area (emissions units P201 through P224, P226 through P255, P346 and P347):

a. the number of gallons of product produced in the 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 8.376 E-05 lbs. OC/gal. of product produced in the Large Batch Production Area for emissions units, P201, and P203 through P211 unless otherwise approved in writing by Ohio EPA, CDO. Additionally, this facility shall utilize a Thindown Tank OC Large Batch Fugitive Stack emission factor of 1.364 E-5 lbs. OC/gal. of product produced in the Large Batch Production Area for emissions units P202 , P212 through P224 , P226 through P255, P346 and P347 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 5.128 E-06 lbs. OC/gal. of product produced in the Large Batch Production Area for emissions units, P201, and P203 through P211 unless otherwise approved in writing by Ohio EPA, CDO. Additionally, this facility shall utilize a Thindown Tank OC Truck Bay Door emission factor of 8.3524 E-7 lbs. OC/gal. of product produced in the Large Batch Production Area for emissions units P202 , P212 through P224 , P226 through P255, P346 and P347 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 4.698 E-05 lbs. OC/gal. of product produced in the Large Batch Production Area for emissions units, P201, and P203 through P211 unless otherwise approved in writing by Ohio EPA, CDO. Additionally, this facility shall utilize a Thindown Tank OC Conc/Ox emission factor of 1.047 E-4 lbs. OC/gal. of product produced in the Large Batch Production Area for emissions units P202 , P212 through P224 , P226 through P255, P346 and P347 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 4.93 E-05 lbs. PM/gal. of product produced in the Large Batch Production Area for emissions units, P201, and P203 through P211 unless otherwise approved in writing by Ohio EPA, CDO. Additionally, this facility shall utilize a Thindown tank PM Large Batch Fugitive Stack emission factor of 1.47 E-6 lbs PM/gal of product produced in the Large Batch Production Area for emission units P202 , P212 through P224 , P226 through P255, P346 and P347 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 3.02 E-6 lbs. PM/gal. of product produced in the Large Batch Production Area for emissions units, P201, and P203 through P211 unless otherwise approved in writing by Ohio EPA, CDO. Additionally, this facility shall utilize a Thindown Tank PM Truck Bay Door emission factor of 9.02 E-8 lbs PM/gal of product produced in the Large Batch Production Area for emission units P202 , P212 through P224 , P226 through P255, P346 and P347 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 ± 1 percent of the temperature being measured at ± 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. the rolling, 12-month summation of OC emissions (summation of C.1.e thru g).

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 product. This VOC emission rate shall be calculated using methodology consistent with that employed in the permit application submitted for this emissions unit on September 26, 2005 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. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month gallons of throughput limitation.

   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).

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 Thindown Tanks, emissions units P202 , P212 through P224 , P226 through P255, P346 and P347, total OC emissions for the Large Batch Premix Tanks, emissions units P201, and P203 through P211, total PM emissions for the Large Batch Production Area, emissions units P201 through P224, P226 through P255, P346 and P347, 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 deviation (excursion) reports which include the following

information:

a. an identification of all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was below the average temperature observed during the most recent performance test that demonstrated the emissions unit was in compliance; and

b. any record of downtime for the capture (collection) system, control device, and monitoring equipment, when the emissions unit was in operation.

These reports are due by the date described in Part 1- General Terms and Conditions of this permit under section (A).

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

5. The permittee shall notify the Ohio EPA Central District Office in writing of any daily record showing that the particulate filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Central District Office within 30 days after the event occurs.

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.

   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).

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.

   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.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 0.66 ton per year.

      Applicable Compliance Method- Compliance with this emission limitation 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- Particulate emissions (PE) shall not exceed 0.02 ton per year.

      Applicable Compliance Method- Compliance with this emission limitation 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 0.027 pound per hour.

      Applicable Compliance Method: Compliance with this emission limitation 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: The baghouse controlling particulate emissions from this emissions unit shall operate with a grain loading of less than 0.0014 grains per dry standard cubic foot.

Applicable Compliance Method: 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.

g. Emission limitation: The emissions from the Large Batch Production Area, Premix and Thindown Tanks, (emissions units P201 through P224, P226 through P255, P346 and P347) shall not exceed the following:

Organic Compounds (OC) from Premix Tanks	1.37 tons/year
Organic Compounds (OC) from Thindown Tanks	0.66 ton/year
Particulate Matter (PM) from Premix Tanks	0.68 ton/year
Particulate Matter (PM) from Thindown Tanks	0.02 ton/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 of these terms and conditions.

F. Miscellaneous Requirements

None