



State of Ohio Environmental Protection Agency

STREET ADDRESS:

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

TELE: (614) 644-3020 FAX: (614) 644-3184  
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P.O. Box 1049  
Columbus, OH 43216-1049

8/6/2009

Certified Mail

Lorie Webb  
Aexcel Corporation  
7373 Production Drive  
Mentor, OH 44060

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL  
Facility ID: 0243081231  
Permit Number: P0104389  
Permit Type: OAC Chapter 3745-31 Modification  
County: Lake

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

Dear Permit Holder:

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

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

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

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

Sincerely,

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

Cc: U.S. EPA  
Ohio EPA-NEDO; Pennsylvania; Canada

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



**Aexcel Corp.**  
**Permit P0104389**  
**Facility ID No. 02 43 08 1231**

### **Permit Strategy Write-up for Emissions Units P001, P002 and P004-P009**

The purpose of this action is a Chapter 31 PTI Modification to supersede all previous PTIs ever issued for P001, P002 and P004-P009.

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

The facility status has been that of a synthetic minor to avoid major source status and the Title V Permit Program. On March 11, 2004, Ohio EPA issued draft/final FEPTOs for emissions unit P001, P002 and P004-P009. Each emissions unit is a paint disperser/mixer, including let-down (thinning) tanks and filling station. The permits had individual OC emissions limit for each tank and facilitywide limits on each single HAP and total combined HAPs.

Synthetic Minor PTI #02-4672 was issued final for this facility on April 4, 1990. It was issued modified final on Jan. 5, 1995. It was again modified on August 24, 2000.

Because the terms and conditions in the FEPTOs were not the same as those in PTI #02-4672, the issue of whether Aexcel Corp. had to do record keeping and reporting as required by both sets of terms and conditions arose. To permanently put an end to any controversy it was decided that issuing a Chapter 31 Modification PTI would permanently settle the matter.

This facility has been a Synthetic Minor to avoid major source status and the Title V Permit Program. Previous permits have limited HAPs emissions to avoid major HAPs source status and the MACT Program. Specifically, Subpart HHHHH of CFR Part 63, the Misc Coating Manufacturing MACT Rule.

The PTI terms are set up into 2 groups of emissions units that have the same terms. The first group includes emissions units P001, P002, P004-P007. Each emissions unit has an annual OC limit of 9.9 tons. The second group includes P008 and P009, which each have an annual OC limit of 7.01 tons.

HAPs emissions for emissions units P001, P002, P004-P009 and P011, combined, are limited to:

- (1.) 6.01 tons per rolling 12-month period for Methanol;
- (2.) 9.03 tons per rolling 12-month period for any individual HAP; and
- (3.) 19.14 tons per rolling 12-month period for total combined HAP.

**Aexcel Corp.**  
**Permit P0104389**  
**Facility ID No. 02 43 08 1231**

Note, a separate FEPTIO was issued for emissions unit P011 earlier this year. It is part of the combined emissions limits for HAPs and has the same terms and conditions.

The facility has emissions data from the previous year and will be able to calculate the rolling 12-month emissions rates required for the first month following issuance this permit.

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

Conclusions: Aexcel Corp. has been officially a synthetic minor facility for 14 years, and this Chapter 31 PTI Mod. will not cause the company status to change, the issuance is therefore recommended.

Prepared By: Ken Djukic  
DAPC-NEDO  
June 29, 2009

PUBLIC NOTICE  
Issuance Of Draft Air Pollution Permit-To-Install  
Aexcel Corporation

Issue Date: 8/6/2009

Permit Number: P0104389

Permit Type: OAC Chapter 3745-31 Modification

Permit Description: This Chapter 31 Modification is being done to supercede all previous PTIs for emissions units P001, P002, P004, P005, P006, P007, P008 & P009. Said emissions units were previously under FEPTOs which expired on 3/11/2009.

Facility ID: 0243081231

Facility Location: Aexcel Corporation  
7373 Production Drive,  
Mentor, OH 44060

Facility Description: Paint and Coating Manufacturing

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





**State of Ohio Environmental Protection Agency  
Division of Air Pollution Control**

**DRAFT**

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

Facility ID: 0243081231  
Permit Number: P0104389  
Permit Type: OAC Chapter 3745-31 Modification  
Issued: 8/6/2009  
Effective: To be entered upon final issuance





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

**Table of Contents**

Authorization ..... 1

A. Standard Terms and Conditions ..... 3

    1. Federally Enforceable Standard Terms and Conditions ..... 4

    2. Severability Clause ..... 4

    3. General Requirements ..... 4

    4. Monitoring and Related Record Keeping and Reporting Requirements ..... 5

    5. Scheduled Maintenance/Malfunction Reporting ..... 6

    6. Compliance Requirements ..... 6

    7. Best Available Technology ..... 7

    8. Air Pollution Nuisance ..... 7

    9. Reporting Requirements ..... 7

    10. Applicability ..... 8

    11. Construction of New Sources(s) and Authorization to Install ..... 8

    12. Permit-To-Operate Application ..... 9

    13. Construction Compliance Certification ..... 9

    14. Public Disclosure ..... 9

    15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations ..... 9

    16. Fees ..... 9

    17. Permit Transfers ..... 10

    18. Risk Management Plans ..... 10

    19. Title IV Provisions ..... 10

B. Facility-Wide Terms and Conditions ..... 11

C. Emissions Unit Terms and Conditions ..... 13

    1. Emissions Unit Group - Disperser D1, D2 & D4-D9: P001, P002, P004, P005, P006, P007 ..... 14

    2. Emissions Unit Group - Dispersers D8 & D9: P008, P009 ..... 19





State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install**

**Permit Number:** P0104389

**Facility ID:** 0243081231

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

## Authorization

Facility ID: 0243081231

Facility Description:

Application Number(s): A0036226

Permit Number: P0104389

Permit Description: This Chapter 31 Modification is being done to supercede all previous PTIs for emissions units P001, P002, P004, P005, P006, P007, P008 & P009. Said emissions units were previously under FEPTOs which expired on 3/11/2009.

Permit Type: OAC Chapter 3745-31 Modification

Permit Fee: \$1,600.00 *DO NOT send payment at this time, subject to change before final issuance*

Issue Date: 8/6/2009

Effective Date: To be entered upon final issuance

This document constitutes issuance to:

Aexcel Corporation  
7373 Production Drive  
Mentor, OH 44060

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

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

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

The above named entity is hereby granted a Permit-to-Install for the emissions unit(s) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the 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

Chris Korleski  
Director



## Authorization (continued)

Permit Number: P0104389

Permit Description: This Chapter 31 Modification is being done to supercede all previous PTIs for emissions units P001, P002, P004, P005, P006, P007, P008 & P009. Said emissions units were previously under FEPTOs which expired on 3/11/2009.

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

**Group Name: Disperser D1, D2 & D4-D9**

<b>Emissions Unit ID:</b>	<b>P001</b>
Company Equipment ID:	D001
Superseded Permit Number:	02-04672
General Permit Category and	Not Applicable
Type:	
<b>Emissions Unit ID:</b>	<b>P002</b>
Company Equipment ID:	D002
Superseded Permit Number:	02-04672
General Permit Category and	Not Applicable
Type:	
<b>Emissions Unit ID:</b>	<b>P004</b>
Company Equipment ID:	D004
Superseded Permit Number:	02-04672
General Permit Category and	Not Applicable
Type:	
<b>Emissions Unit ID:</b>	<b>P005</b>
Company Equipment ID:	D005
Superseded Permit Number:	02-04672
General Permit Category and	Not Applicable
Type:	
<b>Emissions Unit ID:</b>	<b>P006</b>
Company Equipment ID:	D006
Superseded Permit Number:	02-04672
General Permit Category and	Not Applicable
Type:	
<b>Emissions Unit ID:</b>	<b>P007</b>
Company Equipment ID:	D007
Superseded Permit Number:	02-04672
General Permit Category and	Not Applicable
Type:	

**Group Name: Dispersers D8 & D9**

<b>Emissions Unit ID:</b>	<b>P008</b>
Company Equipment ID:	D008
Superseded Permit Number:	02-04672
General Permit Category and	Not Applicable
Type:	
<b>Emissions Unit ID:</b>	<b>P009</b>
Company Equipment ID:	D009
Superseded Permit Number:	02-04672
General Permit Category and	Not Applicable
Type:	



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install**

**Permit Number:** P0104389

**Facility ID:** 0243081231

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

## **A. Standard Terms and Conditions**



**1. Federally Enforceable Standard Terms and Conditions**

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
  - (1) Standard Term and Condition A. 2.a), Severability Clause
  - (2) Standard Term and Condition A. 3.c) through A. 3.e) General Requirements
  - (3) Standard Term and Condition A. 6.c) and A. 6.d), Compliance Requirements
  - (4) Standard Term and Condition A. 9., Reporting Requirements
  - (5) Standard Term and Condition A. 10., Applicability
  - (6) Standard Term and Condition A. 11.b) through A. 11.e), Construction of New Source(s) and Authorization to Install
  - (7) Standard Term and Condition A. 14., Public Disclosure
  - (8) Standard Term and Condition A. 15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
  - (9) Standard Term and Condition A. 16., Fees
  - (10) Standard Term and Condition A. 17., Permit Transfers

**2. Severability Clause**

- a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

**3. General Requirements**

- a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.



- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) 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 or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

#### **4. Monitoring and Related Record Keeping and Reporting Requirements**

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
  - (1) The date, place (as defined in the permit), and time of sampling or measurements.
  - (2) The date(s) analyses were performed.
  - (3) The company or entity that performed the analyses.
  - (4) The analytical techniques or methods used.
  - (5) The results of such analyses.
  - (6) The operating conditions existing at the time of sampling or measurement.
- b) 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.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
  - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Northeast District Office.



(2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Northeast District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.

(3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Ohio EPA DAPC, Northeast District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

(4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

## **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, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Northeast District Office in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

## **6. Compliance Requirements**

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

b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

c) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:



- (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
  - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
  - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- d) The permittee shall submit progress reports to the Ohio EPA DAPC, Northeast District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

## **7. Best Available Technology**

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

## **8. 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.

## **9. Reporting Requirements**

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Northeast District Office.
- 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 state-only required 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 Ohio EPA DAPC, Northeast District Office. 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 (i.e., postmarked) quarterly, 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.)

## **10. Applicability**

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

## **11. Construction of New Sources(s) and Authorization to Install**

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. 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 this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit 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.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. 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.
- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed through completion of the annual PER covering the last period of operation of the affected emissions unit(s).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum,



the permit requirements must be evaluated as part of the PER covering the last period the emissions unit operated.

No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a PER, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

## **12. Permit-To-Operate Application**

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).

## **13. Construction Compliance Certification**

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

## **14. 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.

## **15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations**

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., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

## **16. 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 any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

**17. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Ohio EPA DAPC, Northeast District Office must be notified in writing of any transfer of this permit.

**18. Risk Management Plans**

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

**19. Title IV Provisions**

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install**

**Permit Number:** P0104389

**Facility ID:** 0243081231

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

## **B. Facility-Wide Terms and Conditions**



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install**

**Permit Number:** P0104389

**Facility ID:** 0243081231

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

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



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install**

**Permit Number:** P0104389

**Facility ID:** 0243081231

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

## **C. Emissions Unit Terms and Conditions**



**1. Emissions Unit Group - Disperser D1, D2 & D4-D9: P001, P002, P004, P005, P006, P007,**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
P001	Disperser System 1: Twin-tank 100 HP Hockmeyer dispersion mixer tied to multiple letdown tanks and filling stations.
P002	Disperser System 2: Twin-tank 100 HP Hockmeyer dispersion mixer tied to multiple letdown tanks and filling stations.
P004	Disperser System 4: Twin-tank 50 HP Hockmeyer dispersion mixer tied to multiple shared closed media mills, letdown tanks, and filling stations.
P005	Disperser System 5: Twin-tank 60 HP Cowles dispersion mixer tied to multiple shared closed media mills, letdown tanks, and filling stations.
P006	Disperser System 6: Twin-tank 50 HP Hockmeyer dispersion mixer tied to multiple shared closed media mills, letdown tanks, and filling stations.
P007	Disperser System 7: Twin-tank 50 HP Hockmeyer dispersion mixer tied to multiple shared closed media mills, letdown tanks, shared portable tanks, and filling stations.

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

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

a. None.

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

a. b)(1)a.

b) Applicable Emissions Limitations and/or Control Requirements

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

	<b>Applicable Rules/Requirements</b>	<b>Applicable Emissions Limitations/Control Measures</b>
a.	OAC rule 3745-31-05(D)(1)(b)	Organic compound (OC) emissions shall not exceed 9.9 tons per rolling, 12-month period. This limit is established to limit facility-wide emissions to less than major source status.  See b)(2)a, b)(2)b and b)(2)c below for facility-wide emission limitations on Hazardous Air Pollutants (HAPs).



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-31-05(A)(3)	The requirement of this rule to employ Best Available Technology (BAT) is not applicable as the annual emission of OC will be limited to less than 10 tpy by this permit, see above.
c.	OAC rule 3745-21-07(G)(2)	Not applicable, see b)(2)d below.
d.	40 CFR Part 63, Subpart HHHHH	Not applicable. In accordance with OAC rule 3745-31-05(D)(1)(b), this permit contains synthetic minor emission limitations on HAPs to avoid MACT rule requirements.

(2) Additional Terms and Conditions

- a. The emission of methanol from emissions units P001, P002, P004 through P009 and P011, combined, shall not exceed 6.01 tons per rolling, 12-month period, based upon a rolling, 12-month summation of the monthly emissions. Emissions units P001, P002 and P004 through P009 have been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, methanol summation of the emissions, upon issuance of this permit.
- b. The emission of each individual HAP, excluding methanol, from emissions units P001, P002, P004 through P009 and P011, combined, shall not exceed 9.03 tons per rolling, 12-month period, based upon a rolling, 12-month summation of the monthly emissions. Emissions units P001, P002 and P004 through P009 have been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, individual HAP summation of the emissions, upon issuance of this permit.
- c. The emissions of the total combined HAPs from emissions units P001, P002, P004 through P009 and P011, combined, shall not exceed 19.14 tons per rolling, 12-month period, based upon a rolling, 12-month summation of the monthly emissions. Emissions units P001, P002 and P004 through P009 have been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, total combined HAPs summation of the emissions, upon issuance of this permit.
- d. OAC rule 3745-21-07(G)(2) does not apply because the emissions unit is not involved in "employing, applying, evaporating or drying" photochemically reactive material (Ohio Supreme Court's decision in Ashland Chemical Company vs. Jones (2001), 92 Ohio St. 3d 234).
- e. The requirements of this PTIO shall supercede the requirements of PTI No. 02-4672, originally issued on April 4, 1990 and issued modified on January 5, 1995 and again on August 24, 2000.



- c) Operational Restrictions
  - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
  - (1) The permittee shall maintain monthly records of OC usage sufficient to determine the monthly OC emissions and the OC emissions for the rolling, 12-month period. These records shall include the following information:
    - a. the name or identification of each solvent used in this emissions unit;
    - b. the amount of each solvent used (WS) in this emissions unit, in pounds per month (the WS shall include the initial virgin solvent loaded, any solvent in resin mixtures added, additions to off-spec batches and the recovered solvent from cleanup of other batches);
    - c. the total amount of solvent usage (TWS), in pounds per month (TWS is to be calculated by summing the amounts of all solvents used, in pounds, during the past month);
    - d. a calculation of the monthly OC emissions (MOC), in pounds (the MOC shall be calculated by multiplying the TWS by the facility-wide emission factor (EF), which is a ratio of the pound of OC emitted per pound of solvent used); and
    - e. a calculation of the rolling, 12-month summation of OC emissions.
  - (2) The permittee shall maintain monthly records of individual and total combined HAPs usage for this emissions unit and for emissions units P001, P002, P004 through P009 and P011, combined, sufficient to determine the monthly HAPs emissions and the HAPs emissions for the rolling, 12-month period. These records shall include the following information:
    - a. the name or identification of each HAP used;
    - b. the amount of each individual HAP used (MH), in pounds per month; and
    - c. the monthly emissions of each individual HAP, 'IHAP', in pounds per month. The IHAP shall be calculated by using the following equation:  
$$\text{IHAP} = (\text{MH}/\text{TWS}) * \text{MOC} \text{ (or equivalently IHAP} = \text{MH} * \text{EF)}$$
  - (3) Calculate the following rolling, 12-month summations, in tons, for this emissions unit and for emissions units P001, P002, P004 through P009 and P011, combined:
    - a. the emissions of each individual HAP; and
    - b. the emissions of total combined HAPs.
  - (4) The permittee shall calculate and maintain monthly records of the OC emissions and the rolling, 12-month emissions of OC from this emissions unit.



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



a. Emission Limitation:

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

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1) and d)(4).

b. Emission Limitation:

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

Applicable Compliance Method:

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

c. Emission Limitation:

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

Applicable Compliance Method:

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

d. Emission Limitation:

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

Applicable Compliance Method:

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

g) Miscellaneous Requirements

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



**2. Emissions Unit Group - Dispersers D8 & D9: P008, P009,**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
P008	Disperser System 8: Single-tank 25 HP Cowles dispersion mixer tied to multiple shared closed media mills, shared portable tanks, and filling stations.
P009	Disperser System 9: Single-tank 15 HP Hockmeyer dispersion mixer tied to multiple shared closed media mills, shared portable tanks, and filling stations.

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

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

a. None.

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

a. b(1)a.

b) Applicable Emissions Limitations and/or Control Requirements

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

	<b>Applicable Rules/Requirements</b>	<b>Applicable Emissions Limitations/Control Measures</b>
a.	OAC rule 3745-31-05(D)(1)(b)	Organic compound (OC) emissions shall not exceed 7.01 tons per rolling, 12-month period. This limit is established to limit facility-wide emissions to less than major source status.  See b)(2)a, b)(2)b and b)(2)c below for facility-wide emission limitations on Hazardous Air Pollutants (HAPs).
b.	OAC rule 3745-31-05(A)(3)	The requirement of this rule to employ Best Available Technology (BAT) is not applicable as the annual emission of OC will be limited to less than 10 tpy by this permit, see above.
	OAC rule 3745-21-07(G)(2)	Not applicable, see b)(2)d below.
	40 CFR Part 63, Subpart HHHHH	Not applicable. In accordance with OAC rule 3745-31-05(D)(1)(b), this permit



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		contains synthetic minor emission limitations on HAPs to avoid MACT rule requirements.

(2) Additional Terms and Conditions

- a. The emission of methanol from emissions units P001, P002, P004 through P009 and P011, combined, shall not exceed 6.01 tons per rolling, 12-month period, based upon a rolling, 12-month summation of the monthly emissions. Emissions units P001, P002 and P004 through P009 have been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, methanol summation of the emissions, upon issuance of this permit.
- b. The emission of each individual HAP, excluding methanol, from emissions units P001, P002, P004 through P009 and P011, combined, shall not exceed 9.03 tons per rolling, 12-month period, based upon a rolling, 12-month summation of the monthly emissions. Emissions units P001, P002 and P004 through P009 have been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, individual HAP summation of the emissions, upon issuance of this permit.
- c. The emissions of the total combined HAPs from emissions units P001, P002, P004 through P009 and P011, combined, shall not exceed 19.14 tons per rolling, 12-month period, based upon a rolling, 12-month summation of the monthly emissions. Emissions units P001, P002 and P004 through P009 have been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, total combined HAPs summation of the emissions, upon issuance of this permit.
- d. OAC rule 3745-21-07(G)(2) does not apply because the emissions unit is not involved in "employing, applying, evaporating or drying" photochemically reactive material (Ohio Supreme Court's decision in Ashland Chemical Company vs. Jones (2001), 92 Ohio St. 3d 234).
- e. The requirements of this PTIO shall supercede the requirements of PTI No. 02-4672, originally issued on April 4, 1990 and issued modified on January 5, 1995 and again on August 24, 2000.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of OC usage sufficient to determine the monthly OC emissions and the OC emissions for the rolling, 12-month period. These records shall include the following information:



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



- (7) The permittee shall calculate and maintain monthly records of the total combined HAPs emissions and the rolling, 12-month emissions of total combined HAPs from emissions units P001, P002, P004 through P009 and P011, combined.

e) Reporting Requirements

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

f) Testing Requirements

- (1) Compliance with the allowable emission limitations in b)(1) and b)(2) of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:  
  
OC emissions shall not exceed 7.01 tons per rolling, 12-month period.  
  
Applicable Compliance Method:  
  
Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1) and d)(4).



b. Emission Limitation:

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

Applicable Compliance Method:

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

c. Emission Limitation:

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

Applicable Compliance Method:

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

d. Emission Limitation:

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

Applicable Compliance Method:

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

g) Miscellaneous Requirements

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