State of Ohio Environmental Protection Agency

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

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

MAILING ADDRESS:
P.O. Box 1049
Columbus, OH 43216-1049

8/26/2009

Certified Mail

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

MARC JUAIRE
PLASTI-KOTE CO., INC.
1101 SOUTH 3RD STREET
P.O. BOX 1461
MINNEAPOLIS, MN 55440-1461

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 1652050060
Permit Number: P0105252
Permit Type: OAC Chapter 3745-31 Modification
County: Medina

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, Medina County Gazette. 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

Akron Regional Air Quality Management District
146 South High Street, Room 904
Akron, OH 44308

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 Akron Regional Air Quality Management District at (330)375-2480.

Sincerely,

Michael W. Ahern

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

Cc: U.S. EPA
ARAQMD; Canada

# Permit Strategy Write-Up

1. Check all that apply:

   _X_ Synthetic Minor Determination

   ___ Netting Determination

2. Source Description: Plasti-Kote Company Inc. manufactures various types of paints. The facility consists of two natural gas-fired boilers (B002 and B003), emergency fire water pump (B004), eight spray paint booths (K001, K002, K003, R003, R004, R005, R006, and R007), six filling lines (P002, P003, P004, P005, P006, and P008), thirty-one mixing tanks/stations/room (P007, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P022, P023, P024, P028, P031, P032, P033, P034, P035, P036, P037, P038, P039, P040, P041, P042, P043, and P044), mixing vessels (P001), degassing booth (P021), tank washing (P025), two mill pre-mixing stations (P029 and P030), five mills (P027, Z018, Z029, Z030, and Z031), thirty-six storage tanks (T001, T002, T003, T004, T005, T006, T007, T008, T009, T010, T011, T012, T013, T022, T023, T024, T025, Z020, Z021, Z022, Z023, Z024, Z025, Z060, Z061, Z062, Z063, Z064, Z065, Z066, Z067, Z068, Z069, Z070, Z071, and Z072), lid cleaning (Z059), and ink jet printers (Z074).

3. Facility Emissions and Attainment Status: The facility is currently limited to 249.4 tons of volatile organic compounds (VOC) per rolling, 12-month period, 9.5 tons of any individual hazardous air pollutant (HAP) per rolling, 12-month period, and 24.5 tons of combined HAPS per rolling,12-month period. Medina County is nonattainment for ozone.

4. Source Emissions: The facility has requested to install three new filling lines (P047, P048, and P049) covered in Permit to Install (PTI) P0105244. The facility has also requested to modify three existing mixing tanks (P018, P019, and P020) and to modify eight storage tanks by converting them into mixing tanks (P050, P051, P052, P053, P054, P055, P056, and P057) covered in PTI P0105252. Plasti-Kote Company, Inc. is a major source for nonattainment New Source Review (NSR). The potential VOC, combined HAPs, and any individual HAP emissions for the new installations and the modifications are over 887 tons per year, 289 tons per year, and 143 tons per year, respectively. For emissions units P018, P019, P020, P050, P051, P052, P053, P054, P055, P056, and P057, the potential to emit for PM 2.5 is over 249 tons per year.

5. Conclusion: The facility has requested to maintain the current facility-wide emission limitation for VOC, any individual HAP, and combined HAPs to avoid MACT applicability. The VOC emissions have also been limited to 39.0 tons per year, as a rolling, 12-month summation for emissions units P018, P019, P020, P047, P048, P049, P050, P051, P052, P053, P054, P055, P056, and P057, combined, to avoid major nonattainment NSR. The particulate emissions for P018, P019, P020, P050, P051, P052, P053, P054, P055, P056, and P057, combined has been limit to 9.9 tons per year, as a rolling 12-month summation to avoid major nonattainment NSR and Federal and State modeling requirements. The facility will maintain production records and perform calculations to demonstrate compliance with these limitations.

6. Please provide additional notes or comments as necessary:

   None

7. Total Permit Allowable Emissions Summary (for informational purposes only):

| Pollutant | Tons Per Year |
|---|---|
| VOC | 249.4 tons per rolling, 12-month period for the entire facility |
| Any Individual HAP | 9.5 tons per rolling,12-month period for the entire facility |
| Combined HAPs | 24.5 tons per rolling, 12-month period for the entire facility |
| VOC | 39.0 tons per year, as a rolling, 12-month summation for emissions units P018, P019, P020, P047, P048, P049, P050, P051, P052, P053, P054, P055, P056, and P057, combined |
| PE | 9.9 tons per year, as a rolling 12-month summation for emissions units P018, P019, P020, P050, P051, P052, P053, P054, P055, P056, and P057, combined |

Medina County

PUBLIC NOTICE
Issuance Of Draft Air Pollution Permit-To-Install
PLASTI-KOTE CO., INC.

Issue Date: 8/26/2009
Permit Number: P0105252
Permit Type: OAC Chapter 3745-31 Modification
Permit Description: Chapter 31 modification to three existing mixing tanks and eight storage tanks converting to mixing tanks.
Facility ID: 1652050060
Facility Location: PLASTI-KOTE CO., INC.
1000 LAKE ROAD, P.O. BOX 708
MEDINA, OH 44256-3598
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 Laura Miracle at Akron Regional Air Quality Management District, 146 South High Street, Room 904 or (330)375-2480. The permit can be downloaded from the Web page: www.epa.state.oh.us/dapc

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

# DRAFT

# Air Pollution Permit-to-Install
for
PLASTI-KOTE CO., INC.

Facility ID: 1652050060
Permit Number: P0105252
Permit Type: OAC Chapter 3745-31 Modification
Issued: 8/26/2009
Effective: To be entered upon final issuance

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

**Air Pollution Permit-to-Install**
for
PLASTI-KOTE CO., INC.

## Table of Contents


Authorization ..... 1
A. Standard Terms and Conditions ..... 4
1. Federally Enforceable Standard Terms and Conditions ..... 5
2. Severability Clause ..... 5
3. General Requirements ..... 5
4. Monitoring and Related Record Keeping and Reporting Requirements ..... 6
5. Scheduled Maintenance/Malfunction Reporting ..... 7
6. Compliance Requirements ..... 7
7. Best Available Technology ..... 8
8. Air Pollution Nuisance ..... 8
9. Reporting Requirements ..... 8
10. Applicability ..... 9
11. Construction of New Sources(s) and Authorization to Install ..... 9
12. Permit-To-Operate Application ..... 10
13. Construction Compliance Certification ..... 10
14. Public Disclosure ..... 10
15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations ..... 10
16. Fees ..... 10
17. Permit Transfers ..... 11
18. Risk Management Plans ..... 11
19. Title IV Provisions ..... 11
B. Facility-Wide Terms and Conditions ..... 12
C. Emissions Unit Terms and Conditions ..... 23
1. Emissions Unit Group-Mixing Tanks: P018, P019, P020, P050, P051, P052, P053, P054, P055, P056, P057 ..... 24

# Authorization

Facility ID: 1652050060
Facility Description: Paints and allied products.
Application Number(s): A0037910
Permit Number: P0105252
Permit Description: Chapter 31 modification to three existing mixing tanks and eight storage tanks converting to mixing tanks.
Permit Type: OAC Chapter 3745-31 Modification
Permit Fee: $11,000.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 8/26/2009
Effective Date: To be entered upon final issuance

This document constitutes issuance to:

PLASTI-KOTE CO., INC.
1000 LAKE ROAD
P.O. BOX 708
MEDINA, OH 44256-3598

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:

Akron Regional Air Quality Management District
146 South High Street, Room 904
Akron, OH 44308
(330)375-2480

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: P0105252
Permit Description: Chapter 31 modification to three existing mixing tanks and eight storage tanks converting to mixing tanks.

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

**Group Name: Mixing Tanks**

| | |
|---|---|
| **Emissions Unit ID:** | **P018** |
| Company Equipment ID: | L2 Large Mixing Tank |
| Superseded Permit Number: | 16-01990 |
| General Permit Category and Type: | Not Applicable |
| **Emissions Unit ID:** | **P019** |
| Company Equipment ID: | L4 Large Mixing Tank |
| Superseded Permit Number: | |
| General Permit Category and Type: | Not Applicable |
| **Emissions Unit ID:** | **P020** |
| Company Equipment ID: | L3 Large Mixing Tank |
| Superseded Permit Number: | |
| General Permit Category and Type: | Not Applicable |
| **Emissions Unit ID:** | **P050** |
| Company Equipment ID: | L1 Large Mixing Tank |
| Superseded Permit Number: | |
| General Permit Category and Type: | Not Applicable |
| **Emissions Unit ID:** | **P051** |
| Company Equipment ID: | L5 Large Mixing Tank |
| Superseded Permit Number: | |
| General Permit Category and Type: | Not Applicable |
| **Emissions Unit ID:** | **P052** |
| Company Equipment ID: | L6 Large Mixing Tank |
| Superseded Permit Number: | |
| General Permit Category and Type: | Not Applicable |
| **Emissions Unit ID:** | **P053** |
| Company Equipment ID: | L7 Large Mixing Tank |
| Superseded Permit Number: | |
| General Permit Category and Type: | Not Applicable |
| **Emissions Unit ID:** | **P054** |
| Company Equipment ID: | L8 Large Mixing Tank |
| Superseded Permit Number: | |
| General Permit Category and Type: | Not Applicable |
| **Emissions Unit ID:** | **P055** |
| Company Equipment ID: | L9 Large Mixing Tank |
| Superseded Permit Number: | |
| General Permit Category and Type: | Not Applicable |

| | |
|---|---|
| **Emissions Unit ID:** | **P056** |
| Company Equipment ID: | L10 Large Mixing Tank |
| Superseded Permit Number: | |
| General Permit Category and Type: | Not Applicable |
| **Emissions Unit ID:** | **P057** |
| Company Equipment ID: | L11 Large Mixing Tank |
| Superseded Permit Number: | |
| General Permit Category and Type: | Not Applicable |

# 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 Akron Regional Air Quality Management District.

(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 Akron Regional Air Quality Management District. 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 Akron Regional Air Quality Management District 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 Akron Regional Air Quality Management District 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 Akron Regional Air Quality Management District 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 Akron Regional Air Quality Management District.

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 Akron Regional Air Quality Management District. 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 Akron Regional Air Quality Management District 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.

# B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

   a) None.

   b) Plasti-Kote Co., Inc. has requested to restrict the emissions of any individual hazardous air pollutant (HAP) to 9.5 tons per rolling, 12-month period, the emissions of total combined hazardous air pollutants (HAPs) to 24.5 tons per rolling, 12-month period, and the emissions of volatile organic compounds (VOC) to 249.4 tons per rolling, 12-month period. The company proposed these emission limits to avoid being classified as a major source for PSD and to avoid being classified as a major source as defined in section 63.2 of 40 CFR Part 63 for any upcoming and promulgated Maximum Achievable Control Technology (MACT) standards (i.e., Miscellaneous Organic Chemical Production and Processes, 40 CFR Part 63, Subpart FFFF, and Plastic Parts (surface coating), 40 CFR Part 63, Subpart PPPP). Plasti-Kote Co., Inc. has accepted these emission limits as facility-wide caps on emissions from the following emissions units: B002, B003, B004, K001, K002, K003, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, P037, P038, P039, P040, P041, P042, P043, P044, P047, P048, P049, P050, P051, P052, P053, P054, P055, P056, P057, R003, R004, R005, R006, R007, T001, T002, T003, T004, T005, T006, T007, T008, T009, T010, T011, T012, T013, T014, T015, T016, T022, T023, T024, T025, Z002, Z005, Z018, Z020, Z021, Z022, Z023, Z024, Z025, Z029, Z030, Z031, Z059, Z060, Z061, Z062, Z063, Z064, Z065, Z066, Z067, Z068, Z069, Z070, Z071, Z072, and Z074.

   c) In order to determine compliance with the facility-wide emission limitations, the permittee shall maintain monthly records of the following information for emissions units K001, K002, K003, P002, P003, P004, P005, P006, P007, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P047, P048, P049, P050, P051, P052, P053, P054, P055, P056, P057, R003, R004, R005, and R006:

      (1) For emissions units K001, K002, K003, R003, R004, R005, and R006, combined:

         a. the name and identification number of each coating, as applied;

         b. the VOC content of each coating in pounds of VOC per gallon of coating, as applied;

         c. the individual HAP* content for each HAP of each coating, in weight percent (ratio of each individual HAP to VOC), as applied;

         d. the combined HAPs content of each coating, in weight percent (ratio of combined HAPs to VOC), as applied (sum all the individual HAP contents from c)(1)c. above);

         e. the number of gallons of each coating employed;

         f. the name and identification of each cleanup material employed;

         g. the VOC content of each cleanup material, in pounds of VOC per gallon of cleanup material, as applied;

h. the individual HAP content for each HAP of each cleanup material, in weight percent (ratio of each individual HAP to VOC), as applied;

i. the combined HAPs content of each cleanup material, in weight percent (ratio of combined HAPs to VOC), as applied (sum all the individual HAP contents from c)(1)h. above);

j. the number of gallons of each cleanup material employed;

k. the total VOC from all coatings employed, in tons per month (the sum of c)(1)b. times c(1)e. for each coating, then divide by 2000 lbs/ton);

l. the total VOC from all cleanup materials employed, in tons per month (the sum of c)(1)g. times c)(1)j. for each cleanup material, then divide by 2000 lbs/ton);

m. the total VOC from all coatings and cleanup materials employed, in tons per month (i.e., c)(1)k. plus c)(1)l.);

n. the total individual HAP emissions for each HAP from all coatings employed, in tons per month (for each HAP the sum of c)(1)c. divided by 100 times c)(1)k. for each coating);

o. the total individual HAP emissions for each HAP from all cleanup materials employed, in tons per month (for each HAP the sum of c)(1)h. divided by 100 times c)(1)l. for each cleanup material);

p. the total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in tons per month (i.e., c)(1)n. plus c)(1)o.);

q. the total combined HAPs emissions from all coatings employed, in tons per month (the sum of c)(1)d. divided by 100 times c)(1)k. for each coating);

r. the total combined HAPs emissions from all cleanup materials employed, in tons per month (the sum of c)(1)i. divided by 100 times c)(1)l. for each cleanup material); and

s. the total combined HAPs emissions from all coatings and cleanup materials employed, in tons per month (i.e., c)(1)q. plus c)(1)r.).

Note: The permittee may use a spreadsheet (i.e., the spreadsheets provided in the June 12, 2000 letter from the facility) to maintain the above-mentioned records and to do the emission calculations.

* A listing of the HAPs can be found in section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on a line-by-line basis.

(2) For emissions units P002, P003, P004, P005, and P006:

a. the total number of aerosol paint cans filled using emissions units P002, P003, and P004;

b. the total number of aerosol paint cans filled using emissions units P005 and P006; and

c. the VOC emission rate from gassing, in tons per month (i.e., the sum of the product of c)(2)a. times 0.0048 pounds of VOC per can* plus the product of c)(2)b. times 0.002168 pounds of VOC per can*, divided by 2000 lbs/ton).

*Emission factor is based on manufacturing and/or stack testing data supplied by the permittee in correspondence dated April 25, 2001.

Note: The VOC , individual HAP, and combined HAPs emissions from the filling of paint into the can for emissions unit P002, P003, P004, P005, and P006 are listed under c)(9) below. The VOC, individual HAP, and combined HAPs emissions from the mixing prior to filling the can with paint is determined under c)(4) below.

(3) For emissions unit P007:

a. the company identification for each solvent and cleanup material employed;

b. the throughput of each cleanup material employed, in gallons;

c. the VOC emission rate for all cleanup materials, in pounds per month (i.e., the sum of c)(3)b. times the derived emissions factor* for each cleanup material);

d. the individual HAP emission rate for each HAP for all cleanup materials, in pounds per month (i.e., the sum of c)(3)b. times the derived emissions factor* for each HAP for each cleanup material);

e. the combined HAP emission rate for all cleanup materials, in pounds per month (i.e., the sum of c)(3)b. times the derived emissions factor* for each cleanup material);

f. the total amount of product produced, in gallons;

g. the VOC emission rate for the solvent, in pounds per month (i.e., c)(3)f. times the product density** times the weight fraction of solvent** times 0.01 (AP-42, Section 6.4.1, dated 5/83));

h. the individual HAP emission rate for each for the solvent, in pounds per month (i.e., c)(3)f. times the product density** times the weight fraction of each individual HAP for each HAP** times 0.01 (AP-42, Section 6.4.1, dated 5/83));

i. the combined HAP emission rate for the solvent, in pounds per month (i.e., c)(3)f. times the product density** times the weight fraction of combined HAPs** times 0.01 (AP-42, Section 6.4.1, dated 5/83));

j. the total VOC emission rate for the solvent and all cleanup materials, in tons per month (i.e., c)(3)c. plus c)(3)g., then divided by 2000 lbs/ton);

k. the individual HAP emission rate for each HAP for the solvent and all cleanup materials, in tons per month (i.e., c)(3)d. plus c)(3)h., then divided by 2000 lbs/ton); and

l. the combined HAP emission rate for the solvent and all cleanup materials, in tons per month (i.e., c)(3)e. plus c)(3)i., then divided by 2000 lbs/ton).

*Derived emission factors are from the "Summary of Estimated VOM Emission Rates Vessel Clean-up" document in the PTI application date October 21, 1999. Note: Currently no HAP emissions from the cleanup material.

**The permittee may use a "worst-case" product density and "worst-case" weigh fraction for solvent, individual HAP, and combined HAP instead of actual numbers. If a "worst-case" number is used, the permittee shall have documentation to verify the "worst-case" numbers.

(4) For emissions units P009, P010, P011, P012, P013, P014, P015, P016, P017, P022, P023, P024, and the mixing prior to filling the aerosol paint cans, combined:

a. the total throughput of paint, in pounds per month;

b. the VOC emission rate from filling and surface evaporation, in tons per month (i.e., using the spreadsheets titled Paint Making, Emissions Calculations - Loading Operation and Paint Making, Emissions Calculations - Mixing Operation which uses EIIP Preferred and Alternative Methods for Estimating Air Emissions Volume II, Chapter 8, Section 4, equation 8.4-1 and equation 8.4-22);

c. the individual HAP emission rate for each HAP from filling and surface evaporation, in tons per month (i.e., using the spreadsheets titled Paint Making, Emissions Calculations - Loading Operation and Paint Making, Emissions Calculations - Mixing Operation which uses EIIP Preferred and Alternative Methods for Estimating Air Emissions Volume II, Chapter 8, Section 4, equation 8.4-1 and equation 8.4-22); and

d. the combined HAPs emission rate from filling and surface evaporation, in tons per month (i.e., the sum of the individual HAP emission rates from c)(4)c. above).

(5) For emissions units P018, P019, and P020, combined:

a. the total throughput of each paint category, in gallons per month;

b. the VOC emission rate from filling and surface evaporation for all paint categories, in tons per month (i.e., using the spreadsheets titled Large Mixing Tanks, Emissions Calculations - Loading Operation and Large Mixing Tanks, Emissions Calculations - Mixing Operation which uses EIIP Preferred and Alternative Methods for Estimating Air Emissions Volume II, Chapter 8, Section 4, equation 8.4-1 and equation 8.4-22);

c. the individual HAP emission rate for each HAP from filling and surface evaporation for all paint categories, in tons per month (i.e., using the spreadsheets titled Large Mixing Tanks, Emissions Calculations - Loading Operation and Large Mixing Tanks, Emissions Calculations - Mixing Operation which uses EIIP Preferred and Alternative Methods for Estimating Air Emissions Volume II, Chapter 8, Section 4, equation 8.4-1 and equation 8.4-22); and

d. the combined HAPs emission rate from filling and surface evaporation for all paint categories, in tons per month (i.e., the sum of the individual HAP emission rates from c)(5)c. above).

(6) For emissions unit P021:

a. the number of cans degassed per month; and

b. the VOC emission rate, in tons per month (i.e., multiply c)(6)a. times 0.191875 pound of VOC per can degassed*, then divide by 2000 lbs/ton).

* Emission factor supplied by the permittee in correspondence dated September 15, 2000.

(7) For emissions unit P025:

a. the name and identification of each cleanup material employed;

b. the VOC content of each cleanup material, in pounds of VOC per gallon of cleanup material, as applied;

c. the individual HAP* content for each HAP of each cleanup material, in weight percent, as applied;

d. the combined HAPs content of each cleanup material, in weight percent, as applied (i.e., sum all the individual HAP contents from c)(7)c. above);

e. the number of batches;

f. the total VOC from all cleanup materials employed, in tons per month (i.e., the permittee may use the spreadsheet titled Cleaning Operation Emissions: automatic tank washing machine to determined the emissions);

g. the total individual HAP emissions for each HAP from all cleanup materials employed, in tons per month (i.e., the permittee may use the spreadsheet titled Tank Washing: Automatic and Manual); and

h. the total combined HAPs emissions from all cleanup materials employed, in tons per month (i.e., the permittee may use the spreadsheet titled Cleaning Operation Emissions: automatic tank washing machine to determined the emissions).

* A listing of the HAPs can be found in section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on a line-by-line basis.

(8) For emissions units P047, P048, and P049, combined:

a. the total throughput of each paint category, in gallons per month;

b. the VOC emission rate from filling for all paint categories, in tons per month (i.e., using worst-case derived emission factor for each paint category as calculated

using EIIP Preferred and Alternative Methods for Estimating Air Emissions Volume II, Chapter 8, Section 4, equation 8.4-1);

c. the individual HAP emission rate for each HAP from filling for all paint categories, in tons per month (i.e., using worst-case derived emission factor for each paint category as calculated using EIIP Preferred and Alternative Methods for Estimating Air Emissions Volume II, Chapter 8, Section 4, equation 8.4-1); and

d. the combined HAPs emission rate from filling for all paint categories, in tons per month (i.e., the sum of the individual HAP emission rates from c)(9)c. above).

(9) For emissions units P050, P051, P052, P053, P054, P055, P056, and P057, combined:

a. the total throughput of each paint category, in gallons per month;

b. the VOC emission rate from filling and surface evaporation for all paint categories, in tons per month (i.e., using worst-case derived emission factor for each paint category as calculated using EIIP Preferred and Alternative Methods for Estimating Air Emissions Volume II, Chapter 8, Section 4, equation 8.4-1 and equation 8.4-22);

c. the individual HAP emission rate for each HAP from filling and surface evaporation for all paint categories, in tons per month (i.e., using worst-case derived emission factor for each paint category as calculated using EIIP Preferred and Alternative Methods for Estimating Air Emissions Volume II, Chapter 8, Section 4, equation 8.4-1 and equation 8.4-22); and

d. the combined HAPs emission rate from filling and surface evaporation for all paint categories, in tons per month (i.e., the sum of the individual HAP emission rates from c)(5)c. above).

(10) The following table is a list of all the insignificant emissions units and the insignificant emissions units' potentials to emit (PTE) for VOC, individual HAP, and combined HAPs:

| Emissions Unit ID | PTE for VOC (tpy) | PTE for individual HAP (tpy) | PTE for combined HAPs (tpy) |
|---|---|---|---|
| B002 | 0.0992 | 0.034 | 0.034 |
| B003 | 0.1984 | 0.068 | 0.068 |
| P002, P003, P004, P005, and P006* | 3.93 | 0.79 | 3.144 |
| P008 | 1.16 | 0.19 | 0.5 |
| P027 | 0.65 | 0.18 | 0.30 |
| P028 | 0.97 | 0.88 | 0.97 |
| P029 and P030 | 0.26 | 0.06 | 0.13 |

| | | | |
|---|---|---|---|
| P031, P032, P033, P034, P035, P036, P037, P038, P039, P040, P041, P042, P043, and P044 | 0.21 | 0.14 | 0.29 |
| R007 | 0.79 | 0.08 | 0.22 |
| T001 | 0.262 | 0.262 | 0.262 |
| T002 | 0.1895 | 0.1895 | 0.1895 |
| T003 | 0.074 | 0.074 | 0.074 |
| T004 | 0.11 | 0.11 | 0.11 |
| T006 | 0.2385 | 0.15 | 0.15 |
| T007 | 0.131 | 0.09 | 0.09 |
| T008 | 0.7735 | 0.193375 | 0.193375 |
| T009 | 0.4015 | 0.00803 | 0.00803 |
| T010 | 0.0895 | 0.0895 | 0.0895 |
| T011 | 0.1335 | 0.09 | 0.09 |
| T012 | 0.15 | 0.15 | 0.15 |
| T013 | 0.139 | 0.11 | 0.11 |
| T022 | 0.1 | 0.04 | 0.04 |
| T023 | 0.1 | 0.06 | 0.06 |
| T024 | 0.1 | 0.07 | 0.07 |
| T025 | 0.16 | 0.13 | 0.13 |
| Z002 | 0.03 | 0.0 | 0.0 |
| Z005 | 1.57 | 0.0 | 0.0 |
| Z018 | 0.11 | 0.10 | 0.11 |
| Z020, Z021, Z022, Z023, Z024, and Z025 | 0.942 | 0.18 | 0.43 |
| Z029, Z030, and Z031 | 0.26 | 0.08 | 0.16 |

| | | | |
|---|---|---|---|
| Z059 | 0.34 | 0.068 | 0.085 |
| Z060, Z061, Z062, Z063, Z064, Z065, Z066, Z067, Z068, Z069, Z070, Z071, and Z072 | 1.247 | 0.58 | 1.21 |
| B004 | 0.11 | 0.005 | 0.0126 |
| Z074 | 1.079 | 1.079 | 1.079 |
| TOTAL | 17.1076 | 6.330405 | 10.559005 |

The potentials to emit for the above-mentioned insignificant emissions units are based on the assumed inherent physical limitations that are listed in Table 1 of the letter dated October 1, 2001 from Plasti-kote Co., Inc.

One twelfth of the total annual emissions shall be added to the monthly emissions calculations (i.e., 1.4256 tons of VOC per month, 0.5275 ton of individual HAP per month, and 0.8799 tons of combined HAPs per month).

*The emissions from the filling of aerosol paint cans only.

The permittee shall not employ any material which contains any of the HAPs listed in section 112(b) of the Clean Air Act in emissions units Z002 and Z005. The permittee shall maintain documentation to prove that each material employed does not contain any HAPs.

The permittee shall submit deviation (excursion) reports that identify any day during which any material was employed in emissions units Z002 and/or Z005 which contains any of the HAPs listed in section 112(b) of the Clean Air Act. These reports shall be sent to the Akron RAQMD within 30 days after any such material is employed.

(11) For the entire facility:

a. the total VOC emission rate for the entire facility, in tons per month (i.e., c)(1)m. plus c)(2)c. plus c)(3)j. plus c)(4)b. plus c)(5)b. plus c)(6)b. plus c)(7)f. plus c)(8)b. plus c)(9)b. plus 1.4256);

b. the total individual HAP emission rate for each HAP for the entire facility, in tons per month (i.e., c)(1)p. plus c)(3)k. plus c)(4)c. plus c)(5)c. plus c)(7)g. plus c)(8)c. plus c)(9)c. plus 0.5275));

c. the total combined HAPs emission rate for all emissions units, in tons per month (i.e., c)(1)s. plus c)(3)l. plus c)(4)d. plus c)(5)d. plus c)(7)h. plus c)(8)d. plus c)(9)d. plus 0.8799); and

d. the rolling, 12-month summation of the monthly emissions of each individual HAP, total combined HAPs, and VOC for the entire facility for each calendar month.

(12) For emissions units P018, P019, P020, P047, P048, P049, P050, P051, P052, P053, P054, P055, P056, and P057, combined:

a. The total VOC emission rate, in tons per month (i.e., c)(5)b. plus c)(8)b. plus c)(9)b.)

b. beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the VOC emissions.

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

(13) The permittee shall submit quarterly deviation (excursion) reports that identify:

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. 9.5 tons of individual HAP per rolling, 12-month period for the entire facility;

ii. 24.5 tons of total combined HAPs per rolling, 12-month period for the entire facility;

iii. 249.4 tons of VOC per rolling, 12-month period for the entire facility; and

iv. 39.0 tons of VOC per rolling, 12-month period for emissions units P018, P019, P020, P047, P048, P049, P050, P051, P052, P053, P054, P055, P056, and P057, combined; and

v. for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative VOC emission levels.

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

(14) The permittee shall also submit annual reports that specify the total VOC emissions, total combined HAPs, and total individual HAP emissions for each HAP from the entire facility for the previous calendar year. The annual reports shall be submitted by April 15 of each year, and shall cover the records for the previous calendar year (January through December).

(15) Compliance with the emission limitations in 1.b) above shall be determined in accordance with the following methods:

a. Emission Limitations:

9.5 tons of individual HAP per rolling, 12-month period

24.5 tons of total combined HAPs per rolling, 12-month period

249.4 tons of VOC per rolling, 12-month period

Applicable Compliance Method:

Compliance with the annual allowable VOC, individual HAP, and combined HAPs emission limitations above shall be demonstrated based on the record keeping requirements established in 1.c)(1) through 1.c)(12) above.

(16) The material employed to gas the aerosol paint cans on the paint filling lines (P002, P003, P004, P005, and P006) and on the rework gasser (Z002) shall not contain any of the HAPs listed in section 112(b) of the Clean Air Act. The permittee shall maintain documentation to prove that each material employed does not contain any HAPs.

(17) The permittee shall submit deviation (excursion) reports that identify any day during which any material was employed to gas the aerosol paint cans on the paint filling lines (P002, P003, P004, P005, and P006) and on the rework gasser (Z002) which contains any of the HAPs listed in section 112(b) of the Clean Air Act. These reports shall be sent to the Akron RAQMD within 30 days after any such material is employed.

(18) The permittee shall only store acetone in emissions unit T005. The permittee shall maintain documentation of each time that they store any material other than acetone in emissions unit T005.

(19) The permittee shall submit deviation (excursion) reports that identify any day during which any material other than acetone was stored in emissions unit T005. These reports shall be sent to the Akron RAQMD within 30 days after any such material is stored.

# C. Emissions Unit Terms and Conditions

**1. Emissions Unit Group - Mixing Tanks: P018, P019, P020, P050, P051, P052, P053, P054, P055, P056, P057,**

| EU ID | Operations, Property and/or Equipment Description |
|---|---|
| P018 | 1100 gallon mixing tank |
| P019 | 1100 gallon mixing tank |
| P020 | 1900 gallon mixing tank |
| P050 | 1900 gallon mixing tank |
| P051 | 1500 gallon mixing tank |
| P052 | 1500 gallon mixing tank |
| P053 | 1500 gallon mixing tank |
| P054 | 1500 gallon mixing tank |
| P055 | 1500 gallon mixing tank |
| P056 | 1500 gallon mixing tank |
| P057 | 1500 gallon mixing tank |

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) b)(1)i., b)(1)j., d)(4), d)(5), d)(6), d)(7), d)(8), d)(9), d)(10), e)(2), e)(3), and f)(1)c.

b) Applicable Emissions Limitations and/or Control Requirements

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

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| a. | OAC rule 3745-31-05(A)(3) | For emissions units P018 and P019: The volatile organic compound (VOC) emissions from each emissions unit shall not exceed 13.43 pounds per hour.<br><br>For emissions units P020 and P050: The VOC emissions from each emissions unit shall not exceed 23.20 pounds per hour.<br><br>For emissions units P051, P052, P053, P054, P055, P056, and P057: The VOC emissions from each emissions unit shall not exceed 18.31 pounds per hour.<br><br>See b)(2)d. below. |
| b. | OAC rule 3745-31-05(A)(3) | The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions (PE) from these air |

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| | | contaminant source since the calculated annual emission rate for PE is less than 10 tons/year, taking into account the federally enforceable rule limit of 9.9 tons per year under OAC rule 3745-31-05(D). |
| c. | OAC rule 3745-17-07(A) | Visible PE from the stacks serving these emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule. |
| d. | OAC rule 3745-17-07(B) | Visible PE of fugitive dust from these emissions unit shall not exceed twenty percent opacity as a three-minute average. |
| e. | OAC rule 3745-17-08(B) | See b)(2)c. below. |
| f. | OAC rule 3745-17-11 | 34.53 pounds of PE per hour for stack emissions from emissions units P018, P019, P020, P050, P051, P052, P053, P054, P055, P056, and P057, combined. |
| g. | OAC rule 3745-21-07(G)(2) | As per "The White Rubber Corporation v. Director (ERAC Case No. 675153)" decision, OAC rule 3745-21-07(G) shall not apply to an operation that is purely a mixing process with no chemical manufacturing or chemical reaction occurring. |
| h. | OAC rule 3745-31-05(D)<br><br>(Synthetic Minor to Avoid Nonattainment New Source Review (NSR) and MACT applicability under 40 CFR Part 63, Subpart FFFF and Subpart PPPP) | See 1.b) of Section B – Facility-Wide Terms and Conditions.<br><br>See b)(2)a. below (VOC emission limitation to avoid Nonattainment NSR review for ozone).<br><br>See b)(2)b. below (PE limitation to avoid Nonattainment NSR for PM 2.5 and State and Federal Modeling Requirements).<br><br>The PE from the emissions units listed above shall be vented to a baghouse when one or more of the emissions units are in operation. |
| i. | OAC rule 3745-31-05(E)<br><br>(Voluntary limit to avoid Air Toxic Modeling for Glycol Ethers) | The emissions of glycol ethers as defined in Section 112(b) of the Clean Air Act shall be less than 1.0 ton per year. |
| j. | OAC rule 3745-114-01 | See d)(4) through d)(7) and e)(2). |

(2) Additional Terms and Conditions

a. The emissions of VOC from emissions units P018, P019, P020, P047, P048, P049, P050, P051, P052, P053, P054, P055, P056, and P057, combined, shall not exceed 39.0 tons per year, based upon a rolling, 12-month summation of the monthly emissions. To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

| Month(s) | Maximum Allowable Cumulative Emissions of VOC (Tons) |
|---|---|
| 1 | 3.3 |
| 1-2 | 6.5 |
| 1-3 | 9.8 |
| 1-4 | 13.0 |
| 1-5 | 16.3 |
| 1-6 | 19.5 |
| 1-7 | 22.8 |
| 1-8 | 26.0 |
| 1-9 | 29.3 |
| 1-10 | 32.5 |
| 1-11 | 35.8 |
| 1-12 | 39.0 |

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

b. The emissions of particulates* from emissions units P018, P019, P020, P050, P051, P052, P053, P054, P055, P056, and P057, combined, shall not exceed 9.9 tons per year, based upon a rolling, 12-month summation of the monthly emissions. To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

| Month(s) | Maximum Allowable Cumulative Emissions of Particulates (Tons) |
|---|---|
| 1 | 0.8 |
| 1-2 | 1.7 |
| 1-3 | 2.5 |
| 1-4 | 3.3 |
| 1-5 | 4.1 |
| 1-6 | 5.0 |
| 1-7 | 5.8 |
| 1-8 | 6.6 |
| 1-9 | 7.4 |
| 1-10 | 8.3 |
| 1-11 | 9.1 |
| 1-12 | 9.9 |

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual emission limitation for particulates shall be based upon a rolling, 12-month summation of the monthly emissions.

*Particulate emissions are equal to PM-10 and PM 2.5.

c. The installation and use of hoods, fans, and other equipment to adequately enclose, contain, capture, vent and control the fugitive dust. The collection efficiency is sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.

d. The hourly VOC emission limitations represent the emissions units' potentials to emit. Therefore, no monitoring, record keeping, and/or reporting requirements are necessary to ensure compliance with these limitations.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across each baghouse is between 0.1 to 5.0 inches of water.

(2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across each baghouse when the controlled emissions unit(s) is/are in operation and using powder raw materials (particulate emission producing), including periods of startup and shutdown. The permittee shall record the pressure drop across each baghouse on a daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer=s recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was a deviation;

j. the pressure drop readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

This range or limit on the pressure drop across each baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

(3) The permittee shall collect and record the following information each month for emissions units P018, P019, P020, P050, P051, P052, P053, P054, P055, P056, and P057, combined:

a. the amount of paint produced, in pounds per month;

b. the particulate emissions, in tons per month, i.e., d)(3)a. times 0.32* divided by 2000 pounds per ton times 20 pounds per ton of ingredients in powder form** times (1-0.8991***) and then dividing by 2000 pounds per ton; and

c. beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the particulate emissions.

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

*This is the maximum weight percent of powder raw materials in a batch of paint.

**Emission factor from AP-42 Table 6.4-1 dated 5/83.

***The overall control efficiency of each baghouse.

(4) The Permit to Install (PTI) application for these emissions units, P018, P019, P020, P047, P048, P049, P050, P051, P052, P053, P054, P055, P056, and P057, was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The ATOxic Air Contaminant Statute@, ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled AReview of New Sources of Air Toxic Emissions, Option A@, as follows:

a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been

documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists= (ACGIH) AThreshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices@; or

ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists= (ACGIH) AThreshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices@; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., AX@ hours per day and AY@ days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

TLV/10 x 8/X x 5/Y = 4 TLV/XY = MAGLC

d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or Aworst case@ toxic contaminant(s):

Toxic Contaminant: Toluene (Cumene, Ethyl Benzene, Methanol, Methyl Isobutyl Ketone, and Xylene)

TLV (mg/m3): 75

Maximum Hourly Emission Rate (lbs/hr): 32.64

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1013

MAGLC (ug/m3): 1786

The permittee, has demonstrated that emissions of Toluene (Cumene, Ethyl Benzene, Methanol, Methyl Isobutyl Ketone, and Xylene), from emissions units P018, P019, P020, P047, P048, P049, P050, P051, P052, P053, P054, P055, P056, and P057, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the AToxic Air Contaminant Statute@, ORC 3704.03(F).

(5) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration@, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can

affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the AToxic Air Contaminant Statute@ will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the AToxic Air Contaminant Statute@, ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a “modification”, the permittee shall apply for and obtain a final PTI prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

(6) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the AToxic Air Contaminant Statute@, ORC 3704.03(F):

a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the AToxic Air Contaminant Statute@, ORC 3704.03(F);

c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the AToxic Air Contaminant Statute@, ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

d. the documentation of the initial evaluation of compliance with the AToxic Air Contaminant Statute@, ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

(7) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the AToxic Air Contaminant Statute@, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

(8) The permittee shall collect and record the following information each month for emissions units P018, P019, P020, P050, P051, P052, P053, P054, P055, P056, and P057, combined:

a. the total throughput of each paint category, in gallons per month; and

b. the glycol ethers emission rate from filling and surface evaporation for all paint categories, in ton(s) per month (i.e., using worst-case derived emission factor for each paint category as calculated using EIIP Preferred and Alternative Methods for Estimating Air Emissions Volume II, Chapter 8, Section 4, equation 8.4-1 and equation 8.4-22).

(9) The permittee shall collect and record the following information each month for emissions units P047, P048, and P049, combined:

a. the total throughput of each paint category, in gallons per month; and

b. the glycol ethers emission rate from filling for all paint categories, in ton(s) per month (i.e., using worst-case derived emission factor for each paint category as calculated using EIIP Preferred and Alternative Methods for Estimating Air Emissions Volume II, Chapter 8, Section 4, equation 8.4-1).

(10) The permittee shall collect and record the following information each month for emissions units P018, P019, P020, P047, P048, P049, P050, P051, P052, P053, P054, P055, P056, and P057, combined:

a. the total glycol ethers emissions rate, in ton(s) per month, i.e., d)(6)b. plus d)(7)b.

(11) See Section B – Facility-Wide Terms and Conditions for record keeping requirements.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. each period of time (start time and date, and end time and date) when the pressure drop across either baghouse was outside of the acceptable range;

b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and using powder raw materials (particulate emission producing) and the process emissions were not vented to a baghouse;

c. each incident of deviation described in Aa@ (above) where a prompt investigation was not conducted;

d. each incident of deviation described in Aa@ where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken;

e. each incident of deviation described in Aa@ where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit; and

f. all exceedances of the rolling, 12-month emission limitation for particulates and, for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(2) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the quarterly deviation (excursion) reports. If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.

(3) The permittee shall also submit annual reports that specify the total glycol ethers emissions from emissions units P018, P019, P020, P047, P048, P049, P050, P051, P052, P053, P054, P055, P056, and P057, combined, for the previous calendar year. These reports shall be submitted by April 15 of each year.

(4) See Section B – Facility-Wide Terms and Conditions for reporting requirements.

f) Testing Requirements

(1) Compliance with the emission limitation in b)(2)a. above shall be determined in accordance with the following methods:

a. Emission Limitation:

39.0 tons of VOC per rolling, 12-month period for emissions units P018, P019, P020, P047, P048, P049, P050, P051, P052, P053, P054, P055, P056, and P057, combined.

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation above shall be demonstrated based on the record keeping requirements established in 1.c)(9), 1.c)(10), and 1.c)(13) of Section B – Facility-Wide Terms and Conditions.

b. Emission Limitation:

For emissions units P018 and P019: The VOC emissions from each emissions unit shall not exceed 13.43 pounds per hour.

For emissions units P020 and P050: The VOC emissions from each emissions unit shall not exceed 23.20 pounds per hour.

For emissions units P051, P052, P053, P054, P055, P056, and P057: The VOC emissions from each emissions unit shall not exceed 18.31 pounds per hour.

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitations above shall be demonstrated by multiplying the VOC emission factor of 0.012209 pound of VOC per gallon of paint produced* by the maximum hourly production rate (gallons per hour).

*Emission factor is the worst-case derived emission factor as calculated using EIIP Preferred and Alternative Methods for Estimating Air Emissions Volume II, Chapter 8, Section 4, equation 8.4-1 and equation 8.4-22

c. Emission Limitations:

The emissions of glycol ethers as defined in Section 112(b) of the Clean Air Act shall be less than 1.0 ton per year.

Applicable Compliance Method:

Compliance with the annual allowable glycol ethers emission limitation above shall be demonstrated based on the record keeping requirements established in d)(8) through d)(10) above.

d. Emission Limitation:

Visible PE from the stacks serving these emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9.

e. Emission Limitation:

Visible PE of fugitive dust from these emissions unit shall not exceed twenty percent opacity as a three-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance U.S. EPA Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

f. Emission Limitation:

34.53 pounds of PE per hour for stack emissions from emissions units P018, P019, P020, P050, P051, P052, P053, P054, P055, P056, and P057, combined.

Applicable Compliance Method:

If required, compliance with the hourly allowable PE limitation above shall be determined by using the test method(s) and procedures in U.S. EPA Methods 1 through 5 of 40 CFR Part 60, Appendix A.

g. Emission Limitations:

9.9 tons of particulate emissions per year, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance with the annual allowable particulate emission limitation above shall be demonstrated based on the record keeping requirements established in d)(3) above.

g) Miscellaneous Requirements

(1) None.