

**A. Source Description**

Yenkin-Majestic Paint Corporation operates coating manufacturing facility in Columbus, Franklin County. The facility is currently a Minor Stationary Source pursuant to Title V operating permit requirements for criteria pollutants and HAPs. Yenkin-Majestic proposes to begin occasional mixing of solvent based coatings in the small batch mixing area and wants to limit the emissions to remain non-Title V and avoid the requirements of the National Emission Standards for Miscellaneous Coating Manufacturing (Subpart HHHHH). The mixing area is small and highly batch in operation. They have proposed to limit their facility wide emissions, in order to be a Synthetic Minor.

**B. Facility Emissions and Attainment Status**

Yenkin-Majestic Paint Corporation is currently classified as a Minor Stationary Source pursuant to Title V operating permit requirements for all criteria pollutants and HAP(s). Franklin County is non-attainment for ozone.

**C. Source Emissions**

The facility has requested federally enforceable limitations on individual HAPs and combined HAPs to avoid being subject to Title V permitting and also to avoid being subject to the National Emission Standards for Miscellaneous Coating Manufacturing (Subpart HHHHH). This air permit-to-install (PTI) contains emission restrictions to limit emissions to 9.9 tons of single HAP and 24.9 tons of combined HAPs per rolling, 12-month period. The following table indicates emissions with the federally enforceable limitations of the synthetic minor PTI.

Potential emissions (as defined by federal MACT rules) from all emissions units after the new units are installed and without any federally enforceable restrictions are:

|                |                |
|----------------|----------------|
| VOC            | 87.8 tons/year |
| Total HAP      | 23.5 tons/year |
| Individual HAP | 10.2 tons/year |

Based on the issuance of this synthetic minor permit, the potential emissions from the facility will be:

|                |                |
|----------------|----------------|
| VOC            | 52.6 tons/year |
| Total HAP      | 24.9 tons/year |
| Individual HAP | 9.9 tons/year  |

**D. Conclusion**

Yenkin-Majestic Paint Corporation will become a restrict the facility-wide PTE for HAP to below Major Stationary Source Title V operating permit requirements threshold levels. Monthly monitoring, recordkeeping and calculations, along with and quarterly deviation reports for emission units P001, P004, P005, P006, P007, P008, P009, P010 P011, P012, P013, P014, T001, T002, T003, T004, T005, T006, T007, T008, T009, T010, T011, T012, T013, T014, T015, T016, T017, T018, T019, T020, T021, T022, T023 will be required to monitor compliance. Since allowable emissions are below Major Stationary Source Title V

operating permit requirements threshold levels, this facility will remain a minor source.



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL  
FRANKLIN COUNTY**

**CERTIFIED MAIL**

Street Address:

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

Mailing Address:  
Lazarus Gov.  
Center

**Application No:** 01-12042

**Fac ID:** 0125040262

**DATE:** 10/24/2006

Yenkin Majestic Paint Corp  
Tony Montjoy  
1920 Leonard Ave  
Columbus, OH 43219

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$200** will be due. Please do not submit any payment now.

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

Sincerely,

*Michael W. Ahern*

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

CC: USEPA

CDO

Mid-Ohio Regional Planning Commission

**FRANKLIN COUNTY**

**PUBLIC NOTICE**

**ISSUANCE OF DRAFT PERMIT TO INSTALL 01-12042 FOR AN AIR CONTAMINANT SOURCE FOR  
Yenkin Majestic Paint Corp**

On 10/24/2006 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Yenkin Majestic Paint Corp**, located at **1920 Leonard Ave, Columbus, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 01-12042:

**Small batch mixing area ventilation system.**

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

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



**Permit To Install  
Terms and Conditions**

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

**DRAFT PERMIT TO INSTALL 01-12042**

Application Number: 01-12042  
Facility ID: 0125040262  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: Yenkin Majestic Paint Corp  
Person to Contact: Tony Montjoy  
Address: 1920 Leonard Ave  
Columbus, OH 43219

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**1920 Leonard Ave  
Columbus, Ohio**

Description of proposed emissions unit(s):  
**Small batch mixing area ventilation system.**

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Yenkin Majestic Paint Corp

PTI Application: 01-12042

Issued: To be entered upon final issuance

Part I - GENERAL TERMS AND CONDITIONS

Facility ID: 0125040262

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

### **1. Compliance Requirements**

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

### **2. Reporting Requirements**

The permittee shall submit required reports in the following manner:

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

### **3. Records Retention Requirements**

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

### **4. Inspections and Information Requests**

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections,

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conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

**5. Scheduled Maintenance/Malfunction Reporting**

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

**6. Permit Transfers**

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

**7. Air Pollution Nuisance**

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

**8. Termination of Permit to Install**

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

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

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental

**Yenkin Majestic Paint Corp**

**Facility ID: 0125040262**

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Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

#### **10. Public Disclosure**

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

#### **11. Applicability**

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

#### **12. Best Available Technology**

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

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

Yenkin Majestic Paint Corp

PTI Application: 01-12042

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Facility ID: 0125040262

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

#### 14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

#### 15. Fees

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

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

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

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

| <u>Pollutant</u>  | <u>Tons Per Year</u> |
|-------------------|----------------------|
| Individual HAP    | 9.9                  |
| Combined HAPs     | 24.9                 |
| Organic Compounds | 1.0                  |

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

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

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

**Operations, Property, and/or Equipment - (P014) - Small Batch Mix Area**

| Applicable Rules/Requirements                             | Applicable Emissions Limitations/Control Measures |
|---|---|
| OAC rule 3745-31-02(A)(2)                                 | See A.2.a below                                   |
| OAC rule 3745-21-07(G)(2)                                 | None (see A.2.b below)                            |
| OAC rule 3745-31-05(C)<br>(synthetic minor to avoid MACT) | See B.1 - B.3 below                               |

**2. Additional Terms and Conditions**

- 2.a Permit to Install 01-12042 for this air contaminant source takes into account the following voluntary restriction as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3): Organic Compound (OC) emissions from P014 shall not exceed 1.0 ton/year.
- 2.b P014 is involved only in the mixing of materials, therefore, 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.

**B. Operational Restrictions**

1. The facility wide emissions of individual hazardous air pollutants (IHAP) shall not exceed 9.9 tons per year, based upon a rolling, 12 month summation of the IHAP emissions.

Therefore, the provisions for Title V permitting and the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Miscellaneous Coating Manufacturing in 40 CFR Part 63 Subpart HHHHHH will not be applicable.

To ensure enforceability during the first 12 calendar months following the issuance of

Emissions Unit ID: **P014**

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

this permit, the permittee shall not exceed the emission levels specified in the following table:

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| <u>Month(s)</u> | <u>Maximum Allowable<br/>Cumulative Emissions<br/>of IHAP (Tons)</u> |
|-----------------|--|
| 1               | 2.0  |
| 1-2             | 3.0  |
| 1-3             | 4.0  |
| 1-4             | 5.0  |
| 1-5             | 6.0  |
| 1-6             | 7.0  |
| 1-7             | 8.0  |
| 1-8             | 8.5  |
| 1-9             | 9.0  |
| 1-10            | 9.5  |
| 1-11            | 9.9  |
| 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 IHAP shall be based upon a rolling, 12 month summation of the facility wide 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.

2. The facility wide emissions of total hazardous air pollutants (THAP) shall not exceed 24.9 tons per year, based upon a rolling, 12 month summation of the THAP emissions.

Therefore, the provisions for Title V permitting and the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Miscellaneous Coating Manufacturing in 40 CFR Part 63 Subpart HHHHHH will not be applicable.

To ensure enforceability during the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

| <u>Month(s)</u> | <u>Maximum Allowable<br/>Cumulative Emissions<br/>of THAP (Tons)</u> |
|-----------------|--|
| 1               | 4.0  |

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|      |      |
|------|------|
| 1-2  | 6.0  |
| 1-3  | 8.5  |
| 1-4  | 12.0 |
| 1-5  | 15.0 |
| 1-6  | 18.0 |
| 1-7  | 20.0 |
| 1-8  | 22.5 |
| 1-9  | 23.5 |
| 1-10 | 24.0 |
| 1-11 | 24.9 |
| 1-12 | 24.9 |

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 THAP shall be based upon a rolling, 12 month summation of the facility wide emissions.

3. Facility-wide emissions shall include the following emission units: P001, P004, P005, P006, P007, P008, P009, P010 P011, P012, P013, P014, T001, T002, T003, T004, T005, T006, T007, T008, T009, T010, T011, T012, T013, T014, T015, T016, T017, T018, T019, T020, T021, T022, T023, and all the emission units that are exempt, permit by rule, and de minimis.

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

1. The permittee shall collect and record the following information for each month for this emissions unit operation:
  - a. the company identification for each organic solvent based material and photochemically reactive cleanup material employed;
  - b. the number of gallons of material and photochemically reactive cleanup material employed;
  - c. the OC content of each material and photochemically reactive cleanup material, in pounds per gallon;
  - d. the total OC emission rate for all materials and photochemically reactive cleanup materials, in pounds or tons; and
  - e. the total number of hours the emissions unit was in operation.

Emissions Unit ID: **P014**

The emission factors for material processed as determined from Emission Inventory Improvement Program (STAPPA, ALAPCO, EPA), Volume 2, Chapter 8 - Methods for Estimating Air Emissions from Paint, Ink, and Other Coating Manufacturing Facilities (February 2005).

[Note: The material use information must be for the materials as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

2. The permittee shall maintain the following monthly records on-site to document compliance with the facility-wide emissions limitations for each emission unit specified in B.3 above:
  - a. the calculated OC emissions for the current month, in pounds or tons;
  - b. the calculated IHAP emissions for the current month, in pounds or tons;
  - c. the calculated TCHAP emissions for the current month, in pounds or tons;
  - d. the rolling 12-month summation of IHAP emissions (i.e., the IHAP emissions from the current month added to the summation of the IHAP emissions from the previous 11 months); and
  - e. the rolling 12-month summation of TCHAP emissions (i.e., the TCHAP emissions from the current month added to the summation of the TCHAP emissions from the previous 11 months).

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

1. The permittee shall submit annual reports that specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 30 of each year and may be included in the synthetic minor fee emission report.
2. The permittee shall submit quarterly deviation (excursion) reports for deviations (excursions) associated with exceedances of the facility-wide emission limitations:
  - a. as determined by recordkeeping in section C.2, above, for the rolling 12-month summation of IHAP emissions; and
  - b. as determined by recordkeeping in section C.2, above, for the rolling 12-month

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summation of TCHAP emissions.

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

**E. Testing Requirements**

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

- a. **Emission Limitation**

OC emissions from this emissions unit shall not exceed 1.0 ton per year.

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**Applicable Compliance Method**

Compliance with this emissions limitation shall be demonstrated by the recordkeeping requirements specified in Section D.1 above.

b. **Emission Limitation**

Facility-wide emissions of IHAP shall not exceed 9.9 tons per year, based upon a rolling, 12-month summation.

**Applicable Compliance Method**

Compliance with this emissions limitation shall be demonstrated by the recordkeeping requirements specified in Section B.2 above.

c. **Emission Limitation**

Facility-wide emissions of TCHAP shall not exceed 24.9 tons per year, based upon a rolling, 12-month summation

**Applicable Compliance Method**

Compliance with this emissions limitation shall be demonstrated by the recordkeeping requirements specified in Section B.3 above.

**F. Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic pollutant will be less than 1.0 ton. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that a new permit to install application would be required for an emissions unit if changes in the composition of the materials or use of new materials would cause the emissions of any pollutant that has a listed Threshold Limit Value (TLV), as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices"), to increase to above 1.0 ton per year.
2. The terms and conditions of this PTI from A.1 through E.1 are federally enforceable.