State of Ohio Environmental Protection Agency

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

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

Application No: 01-08498

DATE: 7/8/2004

Sherwin Williams Company
Rick Holt
2121 New World Dr
Columbus, OH 43207

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

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

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

Sincerely,

Michael W. Ahern

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

CC: USEPA **CDO**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install **Issue Date: 7/8/2004**
Terms and Conditions **Effective Date: 7/8/2004**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 01-08498

Application Number:	01-08498
APS Premise Number:	0125041181
Permit Fee:	**$400**
Name of Facility:	Sherwin Williams Company
Person to Contact:	Rick Holt
Address:	2121 New World Dr Columbus, OH 43207

Location of proposed air contaminant source(s) [emissions unit(s)]:
2121 New World Dr
Columbus, Ohio

Description of proposed emissions unit(s):
Grind tank thin and shade tanks and small batch disperser.

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification 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 source(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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install General Terms and Conditions

1. Monitoring and Related Recordkeeping 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:

i. The date, place (as defined in the permit), and time of sampling or measurements.

ii. The date(s) analyses were performed.

iii. The company or entity that performed the analyses.

iv. The analytical techniques or methods used.

v. The results of such analyses.

vi. 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:

i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

ii. Quarterly written reports of (i) any deviations from federally enforceable <u>emission limitations</u>, <u>operational restrictions</u>, <u>and control device operating parameter limitations</u>, 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 appropriate Ohio EPA District Office or local air agency. The written 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. See B.9 below if no deviations occurred during the quarter.

iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., 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.

iv. 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.

2. 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 appropriate Ohio EPA District Office or local air agency 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).

3. 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.

4. 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.

5. Severability Clause

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.

6. 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 reissuance, or modification, or for denial of a permit renewal application.

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, reopened, 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, reopening 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.

7. 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.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are

required under the Act, or any of 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, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

a. 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.

b. 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:

i. 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.

ii. 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.

iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

iv. 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.

c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency 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:

i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

ii. 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.

10. Permit To Operate Application

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

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

11. 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.

12. 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.

B. State Only Enforceable 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 of state-only enforceable 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 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 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. 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.

4. 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.

5. Construction of New Sources(s)

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

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

6. 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.

7. 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.

8. 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.

9. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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.

C. Permit To Install Summary of Allowable Emissions

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

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

Pollutant	Tons Per Year
OC	17.8
PE	1.35

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

None

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

1. The permit to install for these emissions units in this permit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

   Pollutants: 1-methoxy-2-propanol; cyclohexanone; methyl isobutyl ketone; methyl n-amyl ketone; toluene
   TLV (ug/m3): 368,000; 96,299; 204,826; 233,497; 188,405
   Maximum Hourly Emission Rate (lbs/hr):7.2 - stack; 42.54 - fugitive
   Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3,852; 633; 3,852; 3,852; 3,852.
   MAGLC (ug/m3): 8,776; 2,389; 4,877; 5,560; 4,486

   Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

   a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value 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 pollutant with a listed TLV that was proposed in the application and modeled; and

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

2. If the permittee determines that the "Air Toxic Policy" 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

   The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

   a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

   b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

   c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	OAC rule 3745-31-28 and Section 112(g) of the Clean Air Act
P138 - 1,000 gallon grind tank (416) for solvent-based paints vented to a dust collector and thermal oxidizer	OAC rule 3745-31-05(A)(3)	
	OAC rule 3745-21-07(G)(2)	
	OAC rule 3745-17-07(A)(1)	
	OAC rule 3745-17-11(A)	

Applicable Emissions Limitations/Control Measures
Organic compound (OC) emissions shall not exceed 3.93 lbs/batch and 4.0 tons/yr. See sections A.I.2.a and A.II.1 below.
Particulate emissions (PE) shall not exceed 0.22 lb/hr and 0.97 ton/yr. See sections A.I.2.b and A.II.3 below.
Visible PE shall not exceed 5% opacity as a 3-minute average from any stack or outside vent associated with this emission unit, during the addition of solids.
The emission limitation specified by this rule is less stringent than limit established pursuant OAC rule 3745-31-05.
The emission limitation specified by this rule is less stringent than limit established pursuant OAC rule 3745-31-05.
The emission limitation specified by this rule is less stringent than limit established pursuant OAC rule 3745-31-05.
See I.A.2.a and e below.

2. Additional Terms and Conditions

2.a The vapor collection system shall achieve a minimum 90% capture of OC, which shall be vented to the regenerative thermal oxidizer (RTO) that achieves a minimum 95% destruction efficiency.

2.b The PE collection system shall achieve a minimum 70% capture efficiency and vent to the dust collector with that achieves a minimum 95% PE control.

2.c The 0.22 lb PE/hr and 0.97 ton PE/yr emission limitations were established to reflect the potential to emit of this emissions unit. Therefore, record keeping and reporting requirements are not necessary to demonstrate compliance with the PE limitations.

2.d The 3.93 lbs OC/batch and 4.0 tons OC/yr emission limitations were established to reflect the potential to emit of this emission unit. The batch emission limitation is based upon a "worse case" coating during a 4 hour batch period and a 800 gallon batch size at a maximum "worse case" emission rate of 8.84 lbs OC/1,800 gallon batch assuming formulation calculations in the applicant's air permit to install application. The annual emission limitation is based on 6 batches per day based on supplemental information provided by the applicant. Therefore, compliance with the hourly and annual emission limitation is assumed as long as the permittee does not exceed the 6 batch per day operational restriction or manufactures a coating that results in more emission than the "worse case" coating.

2.e Upon final promulgation, the Maximum Achievable Control Technology (MACT) standard for Miscellaneous Coating Manufacturing provisions in 40Code of Federal Register (CFR) Part 63, Subpart HHHHH (MACT HHHHH) will apply to this facility. OAC rule 3745-31-28 and Section 112(g) of the Clean Air Act apply to this project because MACT, HHHHH has not yet been promulgated final and the increase in uncontrolled potential to emit from this project is greater then 10 tons per year for an individual hazardous air pollutant (HAP) and/or 25 tons per year for total combined HAPs. To meet the requirements of OAC rule 3745-31-28 and Section 112(g) of the Clean Air Act, the permittee has committed to meet the draft requirements of MACT, HHHHH through this permit to install for the control requirements as applicable to process vessels as published in the Federal Register on April 4, 2002, and, if the final requirements are more stringent than the draft requirements, to meet the more stringent final MACT, HHHHH requirements through the Title V permit.

II. Operational Restrictions

1. The average combustion temperature within the thermal oxidizer, for any 3-hour block of time when these emissions units are in operation, shall not be less than 50 degrees less than the average combustion temperature during the most recent stack test that demonstrated compliance.

2. The pressure drop across the dust collector shall be maintained within the range of 0.2 and 3 inches of water while the emissions unit is in operation.

3. The permittee shall not grind more than 168 batches of coatings per month.

4. The material addition hatch shall be closed, except during solids addition or product quality check.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

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

   a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was less 50 degrees less than the average combustion temperature during the most recent stack test that demonstrated compliance.

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

2. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual. Once per day the permittee shall record the following in the operations log:

   a. pressure drop across the baghouse for each day of operation, and

   b. a log or record of downtime for the control device and monitoring equipment, when the

associated emissions unit is in operation.

3. The permittee shall maintain monthly records of the following for each emission unit employed for solvent-based grinding at this facility:

   a. the identification number of each formulation and batch production date;

   b. the volume of each solvent, in gallons, added for each batch produced; and

   c. summation of the number of paint batches ground per month.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify:

   a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator is 50 degrees less than the average combustion temperature during the most recent stack test that demonstrated compliance or does not comply with the temperature limitation specified above;

   b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation;

   c. all periods of time during which the pressure drop across the dust collector did not comply with the allowable range specified above;

   d. each month during which more than 168 batches of solvent-based coatings were ground; and

   e. each day during which a higher emitting coating is manufactured as compared to the "worse case coating".

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

2. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. This reporting requirement may be satisfied by including and identifying the specific emissions data for this emissions unit in the annual Fee Emission Report.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I. of these terms and conditions shall be determined in accordance with the following methods:

   a. Emission Limitation:
   OC emissions shall not exceed 3.93 lbs/batch.

   Applicable Compliance Method:
   Compliance shall be determined by using the method described in the Emission Inventory Improvement Program (EIIP), Chapter 8 "Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Facilities" by a 90% capture efficiency assumption and testing to confirm the 98% destruction efficiency. The calculations assume: E = P (X) V (MW) t (Sf)/RT; where: P = 0.5416 psia; MW = 96.83 lb/mol; X = 1 mole; R = 10.73 psia ft3/Ibmol R; 850 ft3/min; T= 565R (105 F); t = 30 min; sf = 8%; (0.5416 psia(1 mol) 850 ft3/min (96.83 Ib/mol) 30 min (0.08))/10.731 psia ft3/Ibmol R (565 R) = 17.65 lbs OC emitted (1 - 0.98 control) = 0.35 lb OC (stack) plus

(17.65/0.9) x (1 - 0.9) = 1.96 lbs OC (fugitive) = 2.3 lbs OC max (0.5 hr) emission.

b. Emission Limitation:
OC emissions shall not exceed 4.0 tons/yr

Applicable Compliance Method:
Compliance shall be assumed as long as the permittee does not exceed that monthly batch emission restriction because the emission is based on the maximum potential to emit.

c Emission Limitation:
PE shall not exceed 0.22 lb/hr.

Applicable Compliance Method:
Compliance shall be demonstrated based on calculation using a Sherwin-Williams emission factor of 0.64 lb PE/ton of pigment times a maximum of 1 ton added per hour reflecting 70% capture and 95% control efficiency. 1 ton * 0.64 lb/ton * (1 -0.7) = 0.19 lb fugitive plus (0.64 lb - 0.19 lb) * (1-0.95) = 0.02 lb stack emission = 0.21 lb PE/hr.

d. Emission Limitation:
PE shall not exceed 0.97 ton/yr.

Applicable Compliance Method:
Compliance shall be demonstrated assuming maximum potential to emit at 0.22 lb PE/hr. 8,760 hrs/yr * 0.22 lb PE/hr * 1 ton/2,000 lbs = 0.964 ton/yr.

e. Emission Limitation:
Visible PE shall not exceed 5% opacity, as a 3-minute average, from any stack or outside vent associated with this emission unit, during the addition of solids.

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

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P138 - 1,000 gallon grind tank (416) for solvent-based paints vented dust collector and thermal oxidizer	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P139 - 1,000 gallon thin and shade tank (382) for water-based paint production	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 0.11 pound per batch and 0.01 ton/yr. See section A.I.2.a and A.II.1 below.
	OAC rule 3745-21-07(G)(2)	The emission limitation specified by this rule is less stringent than limit established pursuant OAC rule 3745-31-05.
	OAC rule 3745-31-28 and Section 112(g) of the Clean Air Act	See I.A.2.b below.

2. Additional Terms and Conditions

2.a The 0.11 lb OC/batch and 0.01 ton OC/yr emission limitations were established to reflect the potential to emit of this emission unit and are based upon a 48 hour batch period at a maximum 0.11 lbs OC/1,000 gallon batch assuming "worst case" coating formulation calculations in the applicant's air permit to install application and supplemental information provided by the applicant. Therefore, compliance with the hourly and annual emission limitation is assumed as long as the permittee does not exceed the operational restriction or manufactures a coating that results in more emission than the "worse case" coating.

2.b Upon final promulgation, the MACT standard for Miscellaneous Coating Manufacturing

provisions in 40CFR Part 63, Subpart HHHHH (MACT HHHHH) will apply to this facility. OAC rule 3745-31-28 and Section 112(g) of the Clean Air Act apply to this project because MACT, HHHHH has not yet been promulgated final and the increase in uncontrolled potential to emit from this project is greater then 10 tons per year for an individual hazardous air pollutant (HAP) and/or 25 tons per year for total combined HAPs. To meet the requirements of OAC rule 3745-31-28 and Section 112(g) of the Clean Air Act, the permittee has committed to meet the draft requirements of MACT, HHHHH through this permit to install for the control requirements as applicable to process vessels as published in the Federal Register on April 4, 2002, and, if the final requirements are more stringent than the draft requirements, to meet the more stringent final MACT, HHHHH requirements through the Title V permit.

II. Operational Restrictions

1. The weight percent of water in water-based coatings shall be greater than the combined weight percent of all VOCs; the combined VOC content shall not exceed 25% by weight; and water shall be employed to clean and rinse the blending vessel to ensure a maximum batch emission rate of 0.11 lb OC/1,000 gallon uncontrolled from the T&S tank.

2. The permittee shall not blend and pump to the filling line more than 15 batches of coating per month from this emission unit.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain the following records on a monthly basis for each batch of water-based coating produced:

   a. the identification number of the formulation and volume, in gallons, of grind pumped into the tank;

   b. the volume, in gallons, of each liquid organic material added to each formulation batch;

   c. the volume, in gallons, of water added to each formulation batch;

   d. a calculation of the liquid organic material content in, percent by weight, in the final coating; and

   e. a summation of cumulative number of batches of water-based coating blended and pumped to the fill line during each month.

IV. Reporting Requirements

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

a. each month during which more than 15 batches of coating were blended and pumped to the fill line from this emissions unit; and

b. each day during which a higher emitting coating is manufactured as compared to the "worse case" coating.

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

2. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. This reporting requirement may be satisfied by including and identifying the specific emissions data for this emissions unit in the annual Fee Emission Report.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I. of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:
OC emissions shall not exceed 0.11 lb/batch.

Applicable Compliance Method:
Compliance shall be determined by using the method described in the Emission Inventory Improvement Program (EIIP), Chapter 8 "Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Facilities": E= P(X)V(MW)/ RT Where: P=1.26 psia; MW=20.1lb/mol; X=1mole; R =10.73 psia ft3/lb mol; V = 160 ft3; T = 570R (110 F); E = 1.264 psia (1 mole) 160.4 ft3 (20.1 lb/mol)/10.73 psia ft3/lbmol R (570 R) = 0.67 lb - 0.56 lb (water emissions) = 0.11 lb OC point

b. Emission Limitation:
OC emissions shall not exceed 0.01 ton/yr.

Applicable Compliance Method:
Compliance shall be assumed as long as the permittee does not exceed that monthly batch emission restriction because the emission is based on the maximum potential to emit.

VI. Miscellaneous Requirements

None

Emissions Unit ID:F139

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P139 - 1,000 gallon thin and shade tank (382) for water-based paint production	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P140 - 1,000 gallon thin and shade tank (383)for water-based paint production	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 0.11 pound per batch and 0.01 ton/yr. See section A.I.2.a and A.II.1 below.
	OAC rule 3745-21-07(G)(2)	The emission limitation specified by this rule is less stringent than limit established pursuant OAC rule 3745-31-05.
	OAC rule 3745-31-28 and Section 112(g) of the Clean Air Act	See I.A.2.b below.

2. Additional Terms and Conditions

2.a The 0.11 lb OC/batch and 0.01 ton OC/yr emission limitations were established to reflect the potential to emit of this emission unit and are based upon a 48 hour batch period at a maximum 0.11 lbs OC/1,000 gallon batch assuming "worst case" coating formulation calculations in the applicant's air permit to install application and supplemental information provided by the applicant. Therefore, compliance with the hourly and annual emission limitation is assumed as long as the permittee does not exceed the operational restriction or manufactures a coating that results in more emission than the "worse case" coating.

2.b Upon final promulgation, the MACT standard for Miscellaneous Coating Manufacturing provisions in 40CFR Part 63, Subpart HHHHH (MACT HHHHH) will apply to this

facility. OAC rule 3745-31-28 and Section 112(g) of the Clean Air Act apply to this project because MACT HHHHH has not yet been promulgated final and the increase in uncontrolled potential to emit from this project is greater then 10 tons per year for an individual hazardous air pollutant (HAP) and/or 25 tons per year for total combined HAPs. To meet the requirements of OAC rule 3745-31-28 and Section 112(g) of the Clean Air Act, the permittee has committed to meet the draft requirements of MACT, HHHHH through this permit to install for the control requirements as applicable to process vessels as published in the Federal Register on April 4, 2002, and, if the final requirements are more stringent than the draft requirements, to meet the more stringent final MACT, HHHHH requirements through the Title V permit.

II. Operational Restrictions

1. The weight percent of water in water-based coatings shall be greater than the combined weight percent of all VOCs; the combined VOC content shall not exceed 25% by weight; and water shall be employed to clean and rinse the blending vessel to ensure a maximum batch emission rate of 0.11 lb OC/1,000 gallon uncontrolled from the T&S tank.

2. The permittee shall not blend and pump to the filling line more than 15 batches of coating per month in this emission unit.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain the following records on a monthly basis for each batch of water-based coating produced:

   a. the identification number of the formulation and volume, in gallons, of grind pumped into the tank;

   b. the volume, in gallons, of each liquid organic material added to each formulation batch;

   c. the volume, in gallons, of water added to each formulation batch;

   d. a calculation of the liquid organic material content in, percent by weight, in the final coating; and

   e. a summation of cumulative number of batches of water-based coating blended and pumped to the fill line during each month.

IV. Reporting Requirements

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

   a. each month during which more than 15 batches of coating were blended and pumped to the fill line from this emissions unit; and

   b. each day during which a higher emitting coating is manufactured as compared to the "worse case" coating.

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

2. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. This reporting requirement may be satisfied by including and identifying the specific emissions data for this emissions unit in the annual Fee Emission Report.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I. of these terms and conditions shall be determined in accordance with the following methods:

   a. Emission Limitation:
   OC emissions shall not exceed 0.11 lb/batch.

   Applicable Compliance Method:
   Compliance shall be determined by using the method described in the Emission Inventory Improvement Program (EIIP), Chapter 8 "Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Facilities": E= P(X)V(MW)/ RT Where: P=1.26 psia; MW=20.1lb/mol; X=1mole; R =10.73 psia ft3/lb mol; V = 160 ft3; T = 570R (110 F); E = 1.264 psia (1 mole) 160.4 ft3 (20.1 lb/mol)/10.73 psia ft3/lbmol R (570 R) = 0.67 lb - 0.56 lb (water emissions) = 0.11 lb OC point

   b. Emission Limitation:
   OC emissions shall not exceed 0.01 ton/yr.

   Applicable Compliance Method:
   Compliance shall be assumed as long as the permittee does not exceed that monthly batch emission restriction because the emission is based on the maximum potential to emit.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P140 - 1,000 gallon thin and shade tank (383)for water-based paint production	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P141 - 1,000 gallon thin and shade tank (384) for water-based paint production	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 0.11 pound per batch and 0.01 ton/yr. See section A.I.2.a and A.II.1 below.
	OAC rule 3745-21-07(G)(2)	The emission limitation specified by this rule is less stringent than limit established pursuant OAC rule 3745-31-05.
	OAC rule 3745-31-28 and Section 112(g) of the Clean Air Act	See I.A.2.b below.

2. Additional Terms and Conditions

2.a The 0.11 lb OC/batch and 0.01 ton OC/yr emission limitations were established to reflect the potential to emit of this emission unit and are based upon a 48 hour batch period at a maximum 0.11 lbs OC/1,000 gallon batch assuming "worst case" coating formulation calculations in the applicant's air permit to install application and supplemental information provided by the applicant. Therefore, compliance with the hourly and annual emission limitation is assumed as long as the permittee does not exceed the operational restriction or manufactures a coating that results in more emission than the "worse case" coating.

2.b Upon final promulgation, the MACT standard for Miscellaneous Coating Manufacturing provisions in 40CFR Part 63, Subpart HHHHH (MACT HHHHH) will apply to this

facility. OAC rule 3745-31-28 and Section 112(g) of the Clean Air Act apply to this project because MACT, HHHHH has not yet been promulgated final and the increase in uncontrolled potential to emit from this project is greater then 10 tons per year for an individual hazardous air pollutant (HAP) and/or 25 tons per year for total combined HAPs. To meet the requirements of OAC rule 3745-31-28 and Section 112(g) of the Clean Air Act, the permittee has committed to meet the draft requirements of MACT, HHHHH through this permit to install for the control requirements as applicable to process vessels as published in the Federal Register on April 4, 2002, and, if the final requirements are more stringent than the draft requirements, to meet the more stringent final MACT, HHHHH requirements through the Title V permit.

II. Operational Restrictions

1. The weight percent of water in water-based coatings shall be greater than the combined weight percent of all VOCs; the combined VOC content shall not exceed 25% by weight; and water shall be employed to clean and rinse the blending vessel to ensure a maximum batch emission rate of 0.11 lb OC/1,000 gallon uncontrolled from the T&S tank.

2. The permittee shall not blend and pump to the filling line more than 15 batches of coating per month in this emission unit.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain the following records on a monthly basis for each batch of water-based coating produced:

   a. the identification number of the formulation and volume, in gallons, of grind pumped into the tank;

   b. the volume, in gallons, of each liquid organic material added to each formulation batch;

   c. the volume, in gallons, of water added to each formulation batch;

   d. a calculation of the liquid organic material content in, percent by weight, in the final coating; and

   e. a summation of cumulative number of batches of water-based coating blended and pumped to the fill line during each month.

IV. Reporting Requirements

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

   a. each month during which more than 1 batches of coating were blended and pumped to the

fill line from this emissions unit; and

b. each day during which a higher emitting coating is manufactured as compared to the "worse case" coating.

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

2. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. This reporting requirement may be satisfied by including and identifying the specific emissions data for this emissions unit in the annual Fee Emission Report.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I. of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:
OC emissions shall not exceed 0.11 lb/batch.

Applicable Compliance Method:
Compliance shall be determined by using the method described in the Emission Inventory Improvement Program (EIIP), Chapter 8 "Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Facilities" : E= P(X)V(MW)/ RT Where: P=1.26 psia; MW=20.1lb/mol; X=1mole; R =10.73 psia ft3/lb mol; V = 160 ft3; T = 570R (110 F); E = 1.264 psia (1 mole) 160.4 ft3 (20.1 lb/mol)/10.73 psia ft3/lbmol R (570 R) = 0.67 lb - 0.56 lb (water emissions) = 0.11 lb OC point

b. Emission Limitation:
OC emissions shall not exceed 0.01 ton/yr.

Applicable Compliance Method:
Compliance shall be assumed as long as the permittee does not exceed that monthly batch emission restriction because the emission is based on the maximum potential to emit.

VI. Miscellaneous Requirements

None

Emissions Unit ID: P141

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P141 - 1,000 gallon thin and shade tank (384) for water-based paint production	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P142 - 1,000 gallon thin and shade tank (385) for water-based paint production	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 0.11 pound per batch and 0.01 ton/yr. See section A.I.2.a and A.II.1 below.
	OAC rule 3745-21-07(G)(2)	The emission limitation specified by this rule is less stringent than limit established pursuant OAC rule 3745-31-05.
	OAC rule 3745-31-28 and Section 112(g) of the Clean Air Act	See I.A.2.b below.

2. Additional Terms and Conditions

2.a The 0.11 lb OC/batch and 0.01 ton OC/yr emission limitations were established to reflect the potential to emit of this emission unit and are based upon a 48 hour batch period at a maximum 0.11 lbs OC/1,000 gallon batch assuming "worst case" coating formulation calculations in the applicant's air permit to install application and supplemental information provided by the applicant. Therefore, compliance with the hourly and annual emission limitation is assumed as long as the permittee does not exceed the operational restriction or manufactures a coating that results in more emission than the "worse case" coating.

2.b Upon final promulgation, the MACT standard for Miscellaneous Coating Manufacturing provisions in 40CFR Part 63, Subpart HHHHH (MACT HHHHH) will apply to this

facility. OAC rule 3745-31-28 and Section 112(g) of the Clean Air Act apply to this project because MACT, HHHHH has not yet been promulgated final and the increase in uncontrolled potential to emit from this project is greater then 10 tons per year for an individual hazardous air pollutant (HAP) and/or 25 tons per year for total combined HAPs. To meet the requirements of OAC rule 3745-31-28 and Section 112(g) of the Clean Air Act, the permittee has committed to meet the draft requirements of MACT, HHHHH through this permit to install for the control requirements as applicable to process vessels as published in the Federal Register on April 4, 2002, and, if the final requirements are more stringent than the draft requirements, to meet the more stringent final MACT, HHHHH requirements through the Title V permit.

II. Operational Restrictions

1. The weight percent of water in water-based coatings shall be greater than the combined weight percent of all VOCs; the combined VOC content shall not exceed 25% by weight; and water shall be employed to clean and rinse the blending vessel to ensure a maximum batch emission rate of 0.11 lb OC/1,000 gallon uncontrolled from the T&S tank.

2. The permittee shall not blend and pump to the filling line more than 15 batches of coating per month from this emission unit.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain the following records on a monthly basis for each batch of water-based coating produced:

    a. the identification number of the formulation and volume, in gallons, of grind pumped into the tank;

    b. the volume, in gallons, of each liquid organic material added to each formulation batch;

    c. the volume, in gallons, of water added to each formulation batch;

    d. a calculation of the liquid organic material content in, percent by weight, in the final coating; and

    e. a summation of cumulative number of batches of water-based coating blended and pumped to the fill line during each month.

IV. Reporting Requirements

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

   a. each month during which more than 15 batches of coating were blended and pumped to the fill line from this emissions unit; and

   b. each day during which a higher emitting coating is manufactured as compared to the "worse case" coating.

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

2. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. This reporting requirement may be satisfied by including and identifying the specific emissions data for this emissions unit in the annual Fee Emission Report.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I. of these terms and conditions shall be determined in accordance with the following methods:

   a. Emission Limitation:
   OC emissions shall not exceed 0.11 lb/batch.

   Applicable Compliance Method:
   Compliance shall be determined by using the method described in the Emission Inventory Improvement Program (EIIP), Chapter 8 "Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Facilities" : E= P(X)V(MW)/ RT Where: P=1.26 psia; MW=20.1lb/mol; X=1mole; R =10.73 psia ft3/lb mol; V = 160 ft3; T = 570R (110 F); E = 1.264 psia (1 mole) 160.4 ft3 (20.1 lb/mol)/10.73 psia ft3/lbmol R (570 R) = 0.67 lb - 0.56 lb (water emissions) = 0.11 lb OC point

   b. Emission Limitation:
   OC emissions shall not exceed 0.01 ton/yr.

   Applicable Compliance Method:
   Compliance shall be assumed as long as the permittee does not exceed that monthly batch emission restriction because the emission is based on the maximum potential to emit.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P142 - 1,000 gallon thin and shade tank (385) for water-based paint production	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P143 - 1,000 gallon thin and shade tank (386) for water-based paint production	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 0.11 pound per batch and 0.01 ton/yr. See section A.I.2.a and A.II.1 below.
	OAC rule 3745-21-07(G)(2)	The emission limitation specified by this rule is less stringent than limit established pursuant OAC rule 3745-31-05.
	OAC rule 3745-31-28 and Section 112(g) of the Clean Air Act	See I.A.2.b below.

2. Additional Terms and Conditions

2.a The 0.11 lb OC/batch and 0.01 ton OC/yr emission limitations were established to reflect the potential to emit of this emission unit and are based upon a 48 hour batch period at a maximum 0.11 lbs OC/1,000 gallon batch assuming "worst case" emission formulation calculations in the applicant's air permit to install application and supplemental information provided by the applicant. Therefore, compliance with the hourly and annual emission limitation is assumed as long as the permittee does not exceed the operational restriction or manufactures a coating that results in more emission than the "worse case" coating.

2.b Upon final promulgation, the MACT standard for Miscellaneous Coating Manufacturing provisions in 40CFR Part 63, Subpart HHHHH (MACT HHHHH) will apply to this

facility. OAC rule 3745-31-28 and Section 112(g) of the Clean Air Act apply to this project because MACT, HHHHH has not yet been promulgated final and the increase in uncontrolled potential to emit from this project is greater then 10 tons per year for an individual hazardous air pollutant (HAP) and/or 25 tons per year for total combined HAPs. To meet the requirements of OAC rule 3745-31-28 and Section 112(g) of the Clean Air Act, the permittee has committed to meet the draft requirements of MACT, HHHHH through this permit to install for the control requirements as applicable to process vessels as published in the Federal Register on April 4, 2002, and, if the final requirements are more stringent than the draft requirements, to meet the more stringent final MACT, HHHHH requirements through the Title V permit.

II. Operational Restrictions

1. The weight percent of water in water-based coatings shall be greater than the combined weight percent of all VOCs; the combined VOC content shall not exceed 25% by weight; and water shall be employed to clean and rinse the blending vessel to ensure a maximum batch emission rate of 0.11 lb OC/1,000 gallon uncontrolled from the T&S tank.

2. The permittee shall not blend and pump to the filling line more than 15 batches of coating per month from this emission unit.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain the following records on a monthly basis for each batch of water-based coating produced:

   a. the identification number of the formulation and volume, in gallons, of grind pumped into the tank;

   b. the volume, in gallons, of each liquid organic material added to each formulation batch;

   c. the volume, in gallons, of water added to each formulation batch;

   d. a calculation of the liquid organic material content in, percent by weight, in the final coating; and

   e. a summation of cumulative number of batches of water-based coating blended and pumped to the fill line during each month.

IV. Reporting Requirements

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

   a. each month during which more than 15 batches of coating were blended and pumped to

the fill line from this emissions unit; and

b. each day during which a higher emitting coating is manufactured as compared to the "worse case" coating.

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

2. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. This reporting requirement may be satisfied by including and identifying the specific emissions data for this emissions unit in the annual Fee Emission Report.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I. of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:
OC emissions shall not exceed 0.11 lb/batch.

Applicable Compliance Method:
Compliance shall be determined by using the method described in the Emission Inventory Improvement Program (EIIP), Chapter 8 "Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Facilities": E= P(X)V(MW)/ RT Where: P=1.26 psia; MW=20.1lb/mol; X=1mole; R =10.73 psia ft3/lb mol; V = 160 ft3; T = 570R (110 F); E = 1.264 psia (1 mole) 160.4 ft3 (20.1 lb/mol)/10.73 psia ft3/lbmol R (570 R) = 0.67 lb - 0.56 lb (water emissions) = 0.11 lb OC point

b. Emission Limitation:
OC emissions shall not exceed 0.01 ton/yr.

Applicable Compliance Method:
Compliance shall be assumed as long as the permittee does not exceed that monthly batch emission restriction because the emission is based on the maximum potential to emit.

VI. Miscellaneous Requirements

None

Emissions Unit ID: P143

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P143 - 1,000 gallon thin and shade tank (386) for water-based paint production	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P144 - 1,500 gallon thin and shade tank (397) for solvent-based paint production w/zeolite cannister	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 0.51 pound per batch and 0.05 ton per year. See section A.I.2.a and A.II.1 below.
	OAC rule 3745-21-07(G)(2)	The emission limitation specified by this rule is equivalent or less stringent than the limit established pursuant OAC rule 3745-31-05.
	OAC rule 3745-31-28 and Section 112(g) of the Clean Air Act	See I.A.2.b below.

2. Additional Terms and Conditions

2.a The 0.51 lb OC/batch and 0.05 ton OC/yr emission limitations were established to reflect the potential to emit of this emission unit and is based upon the following parameters: a 48 hour batch period at a maximum 0.34 lb OC/1,000 gallon batch assuming "worst case" emission formulation calculations in the applicant's air permit to install application and supplemental information provided by the applicant. Therefore, compliance with the hourly and annual emission limitation is assumed as long as the permittee does not exceed the operational restriction or manufactures a coating that results in more emission than the "worse case" coating.

2.b Upon final promulgation, the MACT standard for Miscellaneous Coating Manufacturing

provisions in 40CFR Part 63, Subpart HHHHH (MACT HHHHH) will apply to this facility. OAC rule 3745-31-28 and Section 112(g) of the Clean Air Act apply to this project because MACT, HHHHH has not yet been promulgated final and the increase in uncontrolled potential to emit from this project is greater then 10 tons per year for an individual hazardous air pollutant (HAP) and/or 25 tons per year for total combined HAPs. To meet the requirements of OAC rule 3745-31-28 and Section 112(g) of the Clean Air Act, the permittee has committed to meet the draft requirements of MACT, HHHHH through this permit to install for the control requirements as applicable to process vessels as published in the Federal Register on April 4, 2002, and, if the final requirements are more stringent than the draft requirements, to meet the more stringent final MACT, HHHHH requirements through the Title V permit.

II. Operational Restrictions

1. All OC emissions generated during pump-in and solvent blending in emissions units shall vented to a control device that achieves a minimum 95% removal of OC emissions.

2. The permittee shall not blend and pump to the fill line more than 15 batches of coating per month from this emission unit.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records for each batch of paint produced in the thin and shade tanks:

   a. the identification of the formulation, date and volume of grind pumped into the tank;

   b. the volume of each solvent added during each batch, in either pounds or gallons;

   c. a calculation of the liquid organic material content in percent by weight solvent in the final product with a determination of the photochemical reactivity of the coating; and

   d. the cumulative number of batches of coatings blended and pumped to the fill line from this emission unit.

2. The permittee shall monitor for OC concentrations at a minimum of one time per month in accordance with the Procedure for Organic Vapor Monitoring (OVM) attached to the letter submitted to Ohio EPA, CDO on December 13, 2000. The permittee shall maintain a monthly record on the OVM Log.

   The permittee shall maintain a record of all OVM Logs on file, which shall be made available to representatives of the Ohio EPA, upon request.

IV. Reporting Requirements

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

   a. each month during which 15 batches of coating were blended and pumped to a fill line from this emission unit;

   b. each month during which OVM was not performed;

   c. each instance when a corrective action, that was to be performed as a result of an OVM, was not implemented; and

   d. each day during which a higher emitting coating is manufactured as compared to the "worse case" coating.

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

2. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. This reporting requirement may be satisfied by including and identifying the specific emissions data for this emissions unit in the annual Fee Emission Report.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I. of these terms and conditions shall be determined in accordance with the following methods:

   a. Emission Limitation:
   OC emissions shall not exceed 0.51 lb/batch.

   Applicable Compliance Method:
   Compliance shall be determined by using the method described in the Emission Inventory Improvement Program (EIIP), Chapter 8 "Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Facilities" by a 100% capture efficiency assumption and monitoring to confirm the 95% destruction efficiency: E = P (X) V (MW)/RT: Where P = 0.9364 psia; MW = 96.66 lb/mol; X = 1 mole; R = 10.731 psia ft^3/lbmol R; V = 241 ft3; T = 585 R (125 F); E = 0.9364 psia (1 mole) 241 ff3 (96.66 lb/mol)/10.731 psia ft3/ lbmol R (585 R)= 3.47 lb * (1 - 0.95) = 0.17 lb OC.

   b. Emission Limitation:

Emissions Unit ID: P144

OC emissions shall not exceed 0.05 ton per year.

Applicable Compliance Method:
Compliance shall be assumed as long as the permittee does not exceed that monthly batch emission restriction because the emission is based on the maximum potential to emit.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P144 - 1,500 gallon thin and shade tank (397) for solvent-based paint production w/zeolite cannister	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P145 - 1,500 gallon thin and shade tank (398) for solvent-based paint production w/zeolite cannister	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 0.51 pound per batch and 0.05 ton per year. See section A.I.2.a and A.II.1 below.
	OAC rule 3745-21-07(G)(2)	The emission limitation specified by this rule is equivalent or less stringent than the limit established pursuant OAC rule 3745-31-05.
	OAC rule 3745-31-28 and Section 112(g) of the Clean Air Act	See I.A.2.b below.

2. Additional Terms and Conditions

2.a The 0.51 lb OC/batch and 0.05 ton OC/yr emission limitations were established to reflect the potential to emit of this emission unit and is based upon the following parameters: a 48 hour batch period at a maximum 0.34 lb OC/1,000 gallon batch assuming "worst case" coating formulation calculations in the applicant's air permit to install application and supplemental information provided by the applicant. Therefore, compliance with the hourly and annual emission limitation is assumed as long as the permittee does not exceed the operational restriction or manufactures a coating that results in more emission than the "worse case" coating.

2.b Upon final promulgation, the MACT standard for Miscellaneous Coating Manufacturing

provisions in 40CFR Part 63, Subpart HHHHH (MACT HHHHH) will apply to this facility. OAC rule 3745-31-28 and Section 112(g) of the Clean Air Act apply to this project because MACT, HHHHH has not yet been promulgated final and the increase in uncontrolled potential to emit from this project is greater then 10 tons per year for an individual hazardous air pollutant (HAP) and/or 25 tons per year for total combined HAPs. To meet the requirements of OAC rule 3745-31-28 and Section 112(g) of the Clean Air Act, the permittee has committed to meet the draft requirements of MACT, HHHHH through this permit to install for the control requirements as applicable to process vessels as published in the Federal Register on April 4, 2002, and, if the final requirements are more stringent than the draft requirements, to meet the more stringent final MACT, HHHHH requirements through the Title V permit.

II. Operational Restrictions

1. All OC emissions generated during pump-in and solvent blending in emissions units shall vented to a control device that achieves a minimum 95% removal of OC emissions.

2. The permittee shall not blend and pump to the fill line more than 15 batches of coating per month from this emission unit.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records for each batch of paint produced in the thin and shade tanks:

   a. the identification of the formulation, date and volume of grind pumped into the tank;

   b. the volume of each solvent added during each batch, in either pounds or gallons;

   c. a calculation of the liquid organic material content in percent by weight solvent in the final product with a determination of the photochemical reactivity of the coating; and

   d. the cumulative number of batches of coatings blended and pumped to the fill line from this emission unit.

2. The permittee shall monitor for OC concentrations at a minimum of one time per month in accordance with the Procedure for Organic Vapor Monitoring (OVM) attached to the letter submitted to Ohio EPA, CDO on December 13, 2000. The permittee shall maintain a monthly record on the OVM Log.

The permittee shall maintain a record of all OVM Logs on file, which shall be made available to representatives of the Ohio EPA, upon request.

IV. Reporting Requirements

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

   a. each month during which 15 batches of coating were blended and pumped to a fill line from this emission unit;

   b. each month during which OVM was not performed;

   c. each instance when a corrective action, that was to be performed as a result of an OVM, was not implemented; and

   d. each day during which a higher emitting coating is manufactured as compared to the "worse case" coating.

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

2. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. This reporting requirement may be satisfied by including and identifying the specific emissions data for this emissions unit in the annual Fee Emission Report.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I. of these terms and conditions shall be determined in accordance with the following methods:

   a. Emission Limitation:
   OC emissions shall not exceed 0.51 lb/batch.

   Applicable Compliance Method:
   Compliance shall be determined by using the method described in the Emission Inventory Improvement Program (EIIP), Chapter 8 "Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Facilities" by a 100% capture efficiency assumption and monitoring to confirm the 95% destruction efficiency: E = P (X) V (MW)/RT: Where P = 0.9364 psia; MW = 96.66 lb/mol; X = 1 mole; R = 10.731 psia ft^3 /lbmol R; V = 241 ft3; T = 585 R (125 F); E = 0.9364 psia (1 mole) 241 ff3 (96.66 lb/mol)/10.731 psia ft3/ lbmol R (585 R)= 3.47 lb * (1 - 0.95) = 0.17 lb OC.

   b. Emission Limitation:

OC emissions shall not exceed 0.05 ton per year.

Applicable Compliance Method:
Compliance shall be assumed as long as the permittee does not exceed that monthly batch emission restriction because the emission is based on the maximum potential to emit.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P145 - 1,500 gallon thin and shade tank (398) for solvent-based paint production w/zeolite cannister	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

Emissions Unit ID: P145

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P146 - 2,000 gallon thin and shade tank (375) for solvent-based paint production w/zeolite cannister	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 0.67 pound per batch and 0.06 ton per year. See section A.I.2.a and A.II.1 below.
	OAC rule 3745-21-07(G)(2)	The emission limitation specified by this rule is equivalent or less stringent than the limit established pursuant OAC rule 3745-31-05.
	OAC rule 3745-31-28 and Section 112(g) of the Clean Air Act	See I.A.2.b below.

2. Additional Terms and Conditions

2.a The 0.67 lb OC/batch and 0.06 ton OC/yr emission limitations were established to reflect the potential to emit of this emission unit and is based upon the following parameters: a 48 hour batch period at a maximum 0.34 lb OC/1,000 gallon batch assuming "worst case" coating formulation calculations in the applicant's air permit to install application and supplemental information provided by the applicant. Therefore, compliance with the hourly and annual emission limitation is assumed as long as the permittee does not exceed the operational restriction or manufactures a coating that results in more emission than the "worse case" coating.

2.b Upon final promulgation, the MACT standard for Miscellaneous Coating Manufacturing

provisions in 40CFR Part 63, Subpart HHHHH (MACT HHHHH) will apply to this facility. OAC rule 3745-31-28 and Section 112(g) of the Clean Air Act apply to this project because MACT, HHHHH has not yet been promulgated final and the increase in uncontrolled potential to emit from this project is greater then 10 tons per year for an individual hazardous air pollutant (HAP) and/or 25 tons per year for total combined HAPs. To meet the requirements of OAC rule 3745-31-28 and Section 112(g) of the Clean Air Act, the permittee has committed to meet the draft requirements of MACT, HHHHH through this permit to install for the control requirements as applicable to process vessels as published in the Federal Register on April 4, 2002, and, if the final requirements are more stringent than the draft requirements, to meet the more stringent final MACT, HHHHH requirements through the Title V permit.

II. Operational Restrictions

1. All OC emissions generated during pump-in and solvent blending in emissions units shall vented to a control device that achieves a minimum 95% removal of OC emissions.

2. The permittee shall not blend and pump to the fill line more than 15 batches of coating per month from this emission unit.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records for each batch of paint produced in the thin and shade tanks:

   a. the identification of the formulation, date and volume of grind pumped into the tank;

   b. the volume of each solvent added during each batch, in either pounds or gallons;

   c. a calculation of the liquid organic material content in percent by weight solvent in the final product with a determination of the photochemical reactivity of the coating; and

   d. the cumulative number of batches of coatings blended and pumped to the fill line from this emission unit.

2. The permittee shall monitor for OC concentrations at a minimum of one time per month in accordance with the Procedure for Organic Vapor Monitoring (OVM) attached to the letter submitted to Ohio EPA, CDO on December 13, 2000. The permittee shall maintain a monthly record on the OVM Log.

The permittee shall maintain a record of all OVM Logs on file, which shall be made available to representatives of the Ohio EPA, upon request.

IV. Reporting Requirements

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

   a. each month during which 15 batches of coating were blended and pumped to a fill line from this emission unit;

   b. each month during which OVM was not performed;

   c. each instance when a corrective action, that was to be performed as a result of an OVM, was not implemented; and

   d. each day during which a higher emitting coating is manufactured as compared to the "worse case" coating.

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

2. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. This reporting requirement may be satisfied by including and identifying the specific emissions data for this emissions unit in the annual Fee Emission Report.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I. of these terms and conditions shall be determined in accordance with the following methods:

   a. Emission Limitation:
   OC emissions shall not exceed 0.67 lb/batch.

   Applicable Compliance Method:
   Compliance shall be determined by using the method described in the Emission Inventory Improvement Program (EIIP), Chapter 8 "Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Facilities" by a 100% capture efficiency assumption and monitoring to confirm the 95% destruction efficiency: E = P (X) V (MW)/RT: Where P = 0.9364 psia; MW = 96.66 lb/mol; X = 1 mole; R = 10.731 psia ft^3 /lbmol R; V = 241 ft3; T = 585 R (125 F); E = 0.9364 psia (1 mole) 241 ff3 (96.66 lb/mol)/10.731 psia ft3/ lbmol R (585 R)= 3.47 lb * (1 - 0.95) = 0.17 lb OC.

   b. Emission Limitation:

OC emissions shall not exceed 0.06 ton per year.

Applicable Compliance Method:
Compliance shall be assumed as long as the permittee does not exceed that monthly batch emission restriction because the emission is based on the maximum potential to emit.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P146 - 2,000 gallon thin and shade tank (375) for solvent-based paint production w/zeolite cannister	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P147 - 2,000 gallon thin and shade tank (376) for solvent-based paint production w/ zeolite cannister	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 0.67 pound per batch and 0.06 ton per year. See section A.I.2.a and A.II.1 below.
	OAC rule 3745-21-07(G)(2)	The emission limitation specified by this rule is equivalent or less stringent than the limit established pursuant OAC rule 3745-31-05.
	OAC rule 3745-31-28 and Section 112(g) of the Clean Air Act	See I.A.2.b below.

2. Additional Terms and Conditions

2.a The 0.67 lb OC/batch and 0.06 ton OC/yr emission limitations were established to reflect the potential to emit of this emission unit and is based upon the following parameters: a 48 hour batch period at a maximum 0.34 lb OC/1,000 gallon batch assuming "worst case" coating formulation calculations in the applicant's air permit to install application and supplemental information provided by the applicant. Therefore, compliance with the hourly and annual emission limitation is assumed as long as the permittee does not exceed the operational restriction or manufactures a coating that results in more emission than the "worse case" coating.

2.b Upon final promulgation, the MACT standard for Miscellaneous Coating Manufacturing

provisions in 40CFR Part 63, Subpart HHHHH (MACT HHHHH) will apply to this facility. OAC rule 3745-31-28 and Section 112(g) of the Clean Air Act apply to this project because MACT, HHHHH has not yet been promulgated final and the increase in uncontrolled potential to emit from this project is greater then 10 tons per year for an individual hazardous air pollutant (HAP) and/or 25 tons per year for total combined HAPs. To meet the requirements of OAC rule 3745-31-28 and Section 112(g) of the Clean Air Act, the permittee has committed to meet the draft requirements of MACT, HHHHH through this permit to install for the control requirements as applicable to process vessels as published in the Federal Register on April 4, 2002, and, if the final requirements are more stringent than the draft requirements, to meet the more stringent final MACT, HHHHH requirements through the Title V permit.

II. Operational Restrictions

1. All OC emissions generated during pump-in and solvent blending in emissions units shall vented to a control device that achieves a minimum 95% removal of OC emissions.

2. The permittee shall not blend and pump to the fill line more than 15 batches of coating per month from this emission unit.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records for each batch of paint produced in the thin and shade tanks:

   a. the identification of the formulation, date and volume of grind pumped into the tank;

   b. the volume of each solvent added during each batch, in either pounds or gallons;

   c. a calculation of the liquid organic material content in percent by weight solvent in the final product with a determination of the photochemical reactivity of the coating; and

   d. the cumulative number of batches of coatings blended and pumped to the fill line from this emission unit.

2. The permittee shall monitor for OC concentrations at a minimum of one time per month in accordance with the Procedure for Organic Vapor Monitoring (OVM) attached to the letter submitted to Ohio EPA, CDO on December 13, 2000. The permittee shall maintain a monthly record on the OVM Log.

   The permittee shall maintain a record of all OVM Logs on file, which shall be made available to representatives of the Ohio EPA, upon request.

IV. Reporting Requirements

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

   a. each month during which 15 batches of coating were blended and pumped to a fill line from this emission unit;

   b. each month during which OVM was not performed;

   c. each instance when a corrective action, that was to be performed as a result of an OVM, was not implemented; and

   d. each day during which a higher emitting coating is manufactured as compared to the "worse case" coating.

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

2. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. This reporting requirement may be satisfied by including and identifying the specific emissions data for this emissions unit in the annual Fee Emission Report.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I. of these terms and conditions shall be determined in accordance with the following methods:

   a. Emission Limitation:
   OC emissions shall not exceed 0.67 lb/batch.

   Applicable Compliance Method:
   Compliance shall be determined by using the method described in the Emission Inventory Improvement Program (EIIP), Chapter 8 "Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Facilities" by a 100% capture efficiency assumption and monitoring to confirm the 95% destruction efficiency: E = P (X) V (MW)/RT: Where P = 0.9364 psia; MW = 96.66 lb/mol; X = 1 mole; R = 10.731 psia ft^3/lbmol R; V = 241 ft3; T = 585 R (125 F); E = 0.9364 psia (1 mole) 241 ff3 (96.66 lb/mol)/10.731 psia ft3/ lbmol R (585 R)= 3.47 lb * (1 - 0.95) = 0.17 lb OC.

   b. Emission Limitation:

Emissions Unit ID: P147

OC emissions shall not exceed 0.06 ton per year.

Applicable Compliance Method:
Compliance shall be assumed as long as the permittee does not exceed that monthly batch emission restriction because the emission is based on the maximum potential to emit.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P147 - 2,000 gallon thin and shade tank (376) for solvent-based paint production w/ zeolite cannister	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P148 - 2,000 gallon thin and shade tank (377) for solvent-based paint production w/zeolite production	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 0.67 pound per batch and 0.06 ton per year. See section A.I.2.a and A.II.1 below.
	OAC rule 3745-21-07(G)(2)	The emission limitation specified by this rule is equivalent or less stringent than the limit established pursuant OAC rule 3745-31-05.
	OAC rule 3745-31-28 and Section 112(g) of the Clean Air Act	See I.A.2.b below.

2. Additional Terms and Conditions

2.a The 0.67 lb OC/batch and 0.06 ton OC/yr emission limitations were established to reflect the potential to emit of this emission unit and is based upon the following parameters: a 48 hour batch period at a maximum 0.34 lb OC/1,000 gallon batch assuming "worst case" coating formulation calculations in the applicant's air permit to install application and supplemental information provided by the applicant. Therefore, compliance with the hourly and annual emission limitation is assumed as long as the permittee does not exceed the operational restriction or manufactures a coating that results in more emission than the "worse case" coating.

2.b Upon final promulgation, the MACT standard for Miscellaneous Coating Manufacturing

provisions in 40CFR Part 63, Subpart HHHHH (MACT HHHHH) will apply to this facility. OAC rule 3745-31-28 and Section 112(g) of the Clean Air Act apply to this project because MACT, HHHHH has not yet been promulgated final and the increase in uncontrolled potential to emit from this project is greater then 10 tons per year for an individual hazardous air pollutant (HAP) and/or 25 tons per year for total combined HAPs. To meet the requirements of OAC rule 3745-31-28 and Section 112(g) of the Clean Air Act, the permittee has committed to meet the draft requirements of MACT, HHHHH through this permit to install for the control requirements as applicable to process vessels as published in the Federal Register on April 4, 2002, and, if the final requirements are more stringent than the draft requirements, to meet the more stringent final MACT, HHHHH requirements through the Title V permit.

II. Operational Restrictions

1. All OC emissions generated during pump-in and solvent blending in emissions units shall vented to a control device that achieves a minimum 95% removal of OC emissions.

2. The permittee shall not blend and pump to the fill line more than 15 batches of coating per month from this emission unit.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records for each batch of paint produced in the thin and shade tanks:

   a. the identification of the formulation, date and volume of grind pumped into the tank;

   b. the volume of each solvent added during each batch, in either pounds or gallons;

   c. a calculation of the liquid organic material content in percent by weight solvent in the final product with a determination of the photochemical reactivity of the coating; and

   d. the cumulative number of batches of coatings blended and pumped to the fill line from this emission unit.

2. The permittee shall monitor for OC concentrations at a minimum of one time per month in accordance with the Procedure for Organic Vapor Monitoring (OVM) attached to the letter submitted to Ohio EPA, CDO on December 13, 2000. The permittee shall maintain a monthly record on the OVM Log.

   The permittee shall maintain a record of all OVM Logs on file, which shall be made available to representatives of the Ohio EPA, upon request.

IV. Reporting Requirements

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

   a. each month during which 15 batches of coating were blended and pumped to a fill line from this emission unit;

   b. each month during which OVM was not performed;

   c. each instance when a corrective action, that was to be performed as a result of an OVM, was not implemented; and

   d. each day during which a higher emitting coating is manufactured as compared to the "worse case" coating.

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

2. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. This reporting requirement may be satisfied by including and identifying the specific emissions data for this emissions unit in the annual Fee Emission Report.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I. of these terms and conditions shall be determined in accordance with the following methods:

   a. Emission Limitation:
   OC emissions shall not exceed 0.67 lb/batch.

   Applicable Compliance Method:
   Compliance shall be determined by using the method described in the Emission Inventory Improvement Program (EIIP), Chapter 8 "Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Facilities" by a 100% capture efficiency assumption and monitoring to confirm the 95% destruction efficiency: E = P (X) V (MW)/RT: Where P = 0.9364 psia; MW = 96.66 lb/mol; X = 1 mole; R = 10.731 psia ft^3/lbmol R; V = 241 ft3; T = 585 R (125 F); E = 0.9364 psia (1 mole) 241 ff3 (96.66 lb/mol)/10.731 psia ft3/ lbmol R (585 R)= 3.47 lb * (1 - 0.95) = 0.17 lb OC.

   b. Emission Limitation:

Emissions Unit ID: P148

OC emissions shall not exceed 0.06 ton per year.

Applicable Compliance Method:
Compliance shall be assumed as long as the permittee does not exceed that monthly batch emission restriction because the emission is based on the maximum potential to emit.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P148 - 2,000 gallon thin and shade tank (377) for solvent-based paint production w/zeolite production	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P149 - 2,000 gallon thin and shade tank (378) for solvent-based paint production w/zeolite cannister	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 0.67 pound per batch and 0.06 ton per year. See section A.I.2.a and A.II.1 below.
	OAC rule 3745-21-07(G)(2)	The emission limitation specified by this rule is equivalent or less stringent than the limit established pursuant OAC rule 3745-31-05.
	OAC rule 3745-31-28 and Section 112(g) of the Clean Air Act	See I.A.2.b below.

2. Additional Terms and Conditions

2.a The 0.67 lb OC/batch and 0.06 ton OC/yr emission limitations were established to reflect the potential to emit of this emission unit and is based upon the following parameters: a 48 hour batch period at a maximum 0.34 lb OC/1,000 gallon batch assuming "worst case" coating formulation calculations in the applicant's air permit to install application and supplemental information provided by the applicant. Therefore, compliance with the hourly and annual emission limitation is assumed as long as the permittee does not exceed the operational restriction or manufactures a coating that results in more emission than the "worse case" coating.

2.b Upon final promulgation, the MACT standard for Miscellaneous Coating Manufacturing

provisions in 40CFR Part 63, Subpart HHHHH (MACT HHHHH) will apply to this facility. OAC rule 3745-31-28 and Section 112(g) of the Clean Air Act apply to this project because MACT, HHHHH has not yet been promulgated final and the increase in uncontrolled potential to emit from this project is greater then 10 tons per year for an individual hazardous air pollutant (HAP) and/or 25 tons per year for total combined HAPs. To meet the requirements of OAC rule 3745-31-28 and Section 112(g) of the Clean Air Act, the permittee has committed to meet the draft requirements of MACT, HHHHH through this permit to install for the control requirements as applicable to process vessels as published in the Federal Register on April 4, 2002, and, if the final requirements are more stringent than the draft requirements, to meet the more stringent final MACT, HHHHH requirements through the Title V permit.

II. Operational Restrictions

1. All OC emissions generated during pump-in and solvent blending in emissions units shall vented to a control device that achieves a minimum 95% removal of OC emissions.

2. The permittee shall not blend and pump to the fill line more than 15 batches of coating per month from this emission unit.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records for each batch of paint produced in the thin and shade tanks:

   a. the identification of the formulation, date and volume of grind pumped into the tank;

   b. the volume of each solvent added during each batch, in either pounds or gallons;

   c. a calculation of the liquid organic material content in percent by weight solvent in the final product with a determination of the photochemical reactivity of the coating; and

   d. the cumulative number of batches of coatings blended and pumped to the fill line from this emission unit.

2. The permittee shall monitor for OC concentrations at a minimum of one time per month in accordance with the Procedure for Organic Vapor Monitoring (OVM) attached to the letter submitted to Ohio EPA, CDO on December 13, 2000. The permittee shall maintain a monthly record on the OVM Log.

The permittee shall maintain a record of all OVM Logs on file, which shall be made available to representatives of the Ohio EPA, upon request.

IV. Reporting Requirements

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

   a. each month during which 15 batches of coating were blended and pumped to a fill line from this emission unit;

   b. each month during which OVM was not performed;

   c. each instance when a corrective action, that was to be performed as a result of an OVM, was not implemented; and

   d. each day during which a higher emitting coating is manufactured as compared to the "worse case" coating.

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

2. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. This reporting requirement may be satisfied by including and identifying the specific emissions data for this emissions unit in the annual Fee Emission Report.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I. of these terms and conditions shall be determined in accordance with the following methods:

   a. Emission Limitation:
   OC emissions shall not exceed 0.67 lb/batch.

   Applicable Compliance Method:
   Compliance shall be determined by using the method described in the Emission Inventory Improvement Program (EIIP), Chapter 8 "Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Facilities" by a 100% capture efficiency assumption and monitoring to confirm the 95% removal efficiency: E = P (X) V (MW)/RT: Where P = 0.9364 psia; MW = 96.66 lb/mol; X = 1 mole; R = 10.731 psia ft^3 /lbmol R; V = 241 ft3; T = 585 R (125 F); E = 0.9364 psia (1 mole) 241 ff3 (96.66 lb/mol)/10.731 psia ft3/ lbmol R (585 R)= 3.47 lb * (1 - 0.95) = 0.17 lb OC.

   b. Emission Limitation:

OC emissions shall not exceed 0.06 ton per year.

Applicable Compliance Method:
Compliance shall be assumed as long as the permittee does not exceed that monthly batch emission restriction because the emission is based on the maximum potential to emit.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P149 - 2,000 gallon thin and shade tank (378) for solvent-based paint production w/zeolite cannister	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

Emissions Unit ID: P149

None