



Street Address:

State of Ohio Environmental Protection Agency  
Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:  
Lazarus Gov.  
Center

**RE: DRAFT PERMIT TO INSTALL MODIFICATION  
FRANKLIN COUNTY  
Application No: 01-08601  
Fac ID: 0125041181**

**CERTIFIED MAIL**

**DATE: 10/20/2005**

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

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

A Permit to Install modification may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install modification a fee of **\$ 900** will be due. Please do not submit any payment now.

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

Sincerely,

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

CC: USEPA

CDO

Mid-Ohio Regional Planning Commission

**FRANKLIN COUNTY**

**PUBLIC NOTICE**

**ISSUANCE OF DRAFT PERMIT TO INSTALL 01-08601 FOR AN AIR CONTAMINANT SOURCE FOR  
Sherwin Williams Company**

On 10/20/2005 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Sherwin Williams Company**, located at **2121 New World Dr, Columbus, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 01-08601:

**Coil coating paint production.**

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

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



**Permit To Install  
Terms and Conditions**

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

**DRAFT MODIFICATION OF PERMIT TO INSTALL 01-08601**

Application Number: 01-08601  
Facility ID: 0125041181  
Permit Fee: **To be entered upon final issuance**  
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):

**Coil coating paint production.**

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. Permit to Install General Terms and Conditions****1. Compliance Requirements**

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

**2. Reporting Requirements**

The permittee shall submit required reports in the following manner:

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

**3. Records Retention Requirements**

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

**4. Inspections and Information Requests**

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

**Sherwin Williams Company**

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

**5. Scheduled Maintenance/Malfunction Reporting**

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

**6. Permit Transfers**

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

**7. Air Pollution Nuisance**

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

**8. Termination of Permit to Install**

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

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

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

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compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

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

**10. Public Disclosure**

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

**11. Applicability**

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

**12. Best Available Technology**

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

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

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

#### 14. Construction Compliance Certification

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

#### 15. Fees

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

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

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
PM	3.9
OC	15.4
Individual HAP	9.9
Combined HAPs	24.9

Sherwin Williams Company

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Facility ID: 0125041181

Emissions Unit ID: P170

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

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

- 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
P170 - 1,000 gallon Hi-Low Mixer for solvent-based coating production vented to a dust collector and a thermal oxidizer (417A)	OAC rule 3745-31-05(A)(3)	OAC rule 3745-31-05(C) (synthetic minor to avoid non-attainment new source review)
		OAC rule 3745-35-07(B) (synthetic minor to avoid TV and MACT)
	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

specified by this rule is less stringent than limit established pursuant OAC rule 3745-31-05(A)(3).

Organic compound (OC) emissions shall not exceed 4.9 lbs/batch and 4.9 tons/yr. See sections A.2.a and A.2.d below.

See sections A.2.a, A.2.d, B.3, F.1.b and F.2 below.

Particulate emissions (PE) shall not exceed 0.22 lb/hr and 0.97 ton/yr. See section A.2.b and A.2.c below.

See section A.2.a, A.2.e, F.1, and F.2 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 requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(C) and 3745-35-07(B).

The emission limitation specified by this rule is less stringent than limit established pursuant OAC rule 3745-31-05(A)(3).

The emission limitation specified by this rule is less stringent than limit established pursuant OAC rule 3745-31-05(A)(3).

The emission limitation

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PTI A

Emissions Unit ID: P170

**Issued: To be entered upon final issuance****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 4.9 lbs OC/batch and 4.9 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 "worst case coating" at a 4 hour batch period and a 1,000 gallon batch size at a maximum "worst 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 168 batches per month based on supplemental information provided by the applicant. Therefore, compliance with the annual emission limitation is assumed as long as the permittee does not exceed the 168 batch per month operational restriction or manufactures a coating that results in more emission than the "worse case" coating.
- 2.e** The restrictions to potential to emit (PTE) for emission units at this facility, as maintained in a spreadsheet on-site, will ensure that the individual hazardous air pollutant (IHAP), and total combined hazardous air pollutant (TCHAP) and organic compound (OC), emissions will not exceed the Title V and MACT applicability thresholds of 10 tons IHAP and/or 25 tons TCHAP emissions and 100 tons OC per rolling, 12-month period, respectively.

Therefore, the permittee, by complying with the federally enforceable facility specific terms and conditions specified in Part II.A.2 for listed emission units will not be subject to Title V permitting and provisions in the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Miscellaneous Coating Manufacturing 40 CFR Part 63 Subpart HHHHH.

<sup>1</sup>A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact.

Emissions Unit ID: **P170**

Material Safety Data Sheets typically include a listing of the solvents contained in the adhesive/coatings and clean up materials. This information does not have to be kept on a line-by-line basis.

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

**C. Monitoring and/or Record keeping 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 than 50 degrees Fahrenheit 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

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- b. a log or record of downtime for the control device and monitoring equipment, when the associated emissions unit is in operation.

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3. The permittee shall maintain monthly records of the following for solvent-based paint production:
  - 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.

**D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports which identify deviations (excursions) associated with the following emissions limitations and operational restrictions:
  - a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator 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.

**E. Testing Requirements**

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**PTI A**

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1. Compliance with the emission limitations in section A.1. of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:  
OC emissions shall not exceed 4.9 lbs/batch.

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PTI A

Emissions Unit ID: P170

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## Applicable Compliance Method:

Compliance shall be determined by using the Air Pollutant Emissions Module (APEM) based on PlantWare Batch Recipes (Sherwin-Williams, March 1999) 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", assuming 90% capture and 98% destruction efficiency confirmed through testing. 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 ft<sup>3</sup>/lbmol R;  $850$  ft<sup>3</sup>/min;  $T = 565R$  (105 F);  $t = 30$  min;  $sf = 8\%$ ;  $(0.5416 \text{ psia}(1 \text{ mol}) 850 \text{ ft}^3/\text{min} (96.83 \text{ lb/mol}) 30 \text{ min} (0.08))/10.731 \text{ psia ft}^3/\text{lbmol R} (565 \text{ R}) = 17.65$  lbs OC emitted  $(1 - 0.95 \text{ control}) = 0.88$  lb OC (stack) plus  $(17.65/0.9) \times (1 - 0.9) = 1.96$  lbs OC (fugitive) = 2.84 lbs OC max (0.5 hr) emission. Therefore, compliance with the batch emission limitation is assumed as long as the permittee does not manufacture a coating that results in more emission than the "worse case" coating and the thermal incinerator combustion chamber temperature is operated within the applicable 3-hour average combustion temperature range.

- b. Emission Limitation:  
OC emissions shall not exceed 4.9 tons/yr

## Applicable Compliance Method:

Compliance shall be assumed as long as the permittee does not exceed the month 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 through monitoring and record keeping found in section C.2.

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

## Applicable Compliance Method:

Compliance with the annual emission limitation shall be assumed as long as the emission unit complies with the hourly limit.

- e. Emission Limitation:

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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).

**Sherv****PTI A**Emissions Unit ID: **P170****Issued: To be entered upon final issuance****F. Miscellaneous Requirements**

1. The restrictions on the potential to emit for individual hazardous air pollutants (IHAP), total combined hazardous air pollutants (TCHAP) and organic compounds (OC) established under OAC rule 3745-31-05(C) are as follows for the emissions units listed in term F.2 below:
  - a. the IHAP and TCHAP emissions shall not exceed 9.9 tons and 24.9 tons per rolling, 12-month period, respectively, and
  - b. the total OC emissions shall not exceed 99.9 tons per rolling, 12- month period.
2. The operational restriction on the potential to emit for IHAP, TCHAP and OC that establish federally enforceable limitations are as follows:
  - a. the permittee shall capture 90% of all OC emissions from solvent-based high speed dispersers in emission units identified as P013, P014, P016, P017, P021, P022, P023, P024, P025, P026, P027, P117, P118, P138, P170, P171 and P172 with venting to a regenerative thermal oxidizer (RTO) that achieves a minimum 95% destruction of O; and
  - b. the permittee shall capture 100% of all OC emissions from solvent-based thin and shade tanks in emission units identified as P047, P048, P049, P050, P051, P052, P053, P054, P055, P056, P057, P058, P059, P060, P061, P062, P063, P064, P065, P066, P067, P068, P069, P070, P071, P072, P073, P074, P075, P076, P103, P104, P105, P106, P107, P108, P109, P110, P111, P112, P113, P114, P115, P116, P120, P144, P145, P146, P147, P148, P149, P150, P154, P155, P156, P160, P161, P162, P163, P164, P165, P173, P174, P175, P176, P177, and P178 with venting to a control device that achieves a minimum 95% removal of OC emissions.
3. The permittee shall maintain the following monthly records, as maintained in a spreadsheet on-site, to document compliance with the restrictions to potential to emit for OC, IHAP, and TCHAP for emissions units P013, P014, P016, P017, P021, P022, P023, P024, P025, P026, P027, P117, P118, P138, P170, P171, P172, P047, P048, P049, P050, P051, P052, P053, P054, P055, P056, P057, P058, P059, P060, P061, P062, P063, P064, P065, P066, P067, P068, P069, P070, P071, P072, P073, P074, P075, P076, P103, P104, P105, P106, P107, P108, P109, P110, P111, P112, P113, P114, P115, P116, P120, P146, P147, P148, P149, P150, P160, P161, P162, P163, P164, P165, P173, P174, P175, P176, P177, and P178 are as follows:
  - a. the calculated OC emissions rate for the current month, in pounds or tons;

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- b. the rolling, 12-month summation of OC emissions (i.e., the OC emissions from the current month added to the summation of the OC emissions from the previous 11 months);
  - c. the calculated IHAP emissions rate for the current month, in pounds or tons;
  - d. the calculated TCHAP emissions rate for the current month, in pounds or tons;
  - e. the rolling 12-month summation of IHAP emissions (i.e., the IHAP emissions from the current month added to the summation of the IHAP emissions from the previous 11 months); and
  - f. the rolling 12-month summation of TCHAP emissions (i.e., the TCHAP emissions from the current month added to the summation of the TCHAP emissions from the previous 11 months).
4. The permittee shall submit quarterly deviation (excursion) reports for deviations (excursions) associated with exceedances of the following emission limitations and operational restrictions:
- a. the rolling 12-month IHAP and TCHAP emission limitations; and
  - b. the rolling, 12-month OC emission limitation.

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

5. Compliance with the emission limitations in Part II, section F.1 of these terms and conditions shall be determined in accordance with the following methods:
- a. **Emission Limitation:**  
The IHAP and TCHAP emissions shall not exceed 9.9 tons and 24.9 tons per rolling, 12-month period, respectively.  
  
**Applicable Compliance Method:**  
Compliance shall be demonstrated by the record keeping requirements specified in section F.3 of this permit.
  - b. **Emission Limitation:**  
The total OC emissions shall not exceed 99.9 tons per rolling, 12-month period.

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**Emissions Unit ID: P170**

Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping requirements specified in section F.3 of this permit.

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PTI A

Emissions Unit ID: P171

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

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
P171 - 1,000 gallon Hi-Low mixer for solvent-based coating production vented to a baghouse and thermal oxidizer (417B)	OAC rule 3745-31-05(A)(3)	OAC rule 3745-17-11(A)
		OAC rule 3745-31-05(C) (synthetic minor to avoid non-attainment new source review)
		OAC rule 3745-35-07(B) (synthetic minor to avoid TV and MACT)
	OAC rule 3745-21-07(G)(2)	
	OAC rule 3745-17-07(A)(1)	

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<u>Applicable Emissions Limitations/Control Measures</u>	established pursuant OAC rule 3745-31-05(A)(3).
Organic compound (OC) emissions shall not exceed 4.9 lbs/batch and 4.9 tons/yr. See sections A.2.a and A.2.d below.	The emission limitation specified by this rule is less stringent than limit established pursuant OAC rule 3745-31-05(A)(3).
Particulate emissions (PE) shall not exceed 0.22 lb/hr and 0.97 ton/yr. See sections A.2.b and A.2.c below.	See sections A.2.a, A.2.d, B.3, F.1.b and F.2 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.	See section A.2.a, A.2.e, F.1, and F.2 below.
The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(C) and 3745-35-07(B).	
The emission limitation specified by this rule is less stringent than limit established pursuant OAC rule 3745-31-05(A)(3).	
The emission limitation specified by this rule is less stringent than limit	

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- 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 4.9 lbs OC/batch and 4.9 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 "worst case coating" at a 4 hour batch period and a 800 gallon batch size at a maximum "worst 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 annual emission limitation is assumed as long as the permittee does not exceed the 168 batch per month operational restriction or manufactures a coating that results in more emission than the "worse case" coating.
- 2.e** The restrictions to potential to emit (PTE) for emission units at this facility, as maintained in a spreadsheet on-site, will ensure that the individual hazardous air pollutant (IHAP), and total combined hazardous air pollutant (TCHAP) and organic compound (OC), emissions will not exceed the Title V and MACT applicability thresholds of 10 tons IHAP and/or 25 tons TCHAP emissions and 100 tons OC per rolling, 12-month period, respectively.

Therefore, the permittee, by complying with the federally enforceable facility specific terms and conditions specified in Part II.A.2 for listed emission units will not be subject to Title V permitting and provisions in the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Miscellaneous Coating Manufacturing 40 CFR Part 63 Subpart HHHHH.

<sup>1</sup>A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact.

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Material Safety Data Sheets typically include a listing of the solvents contained in the adhesive/coatings and clean up materials. This information does not have to be kept on a line-by-line basis.

**B. 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 Fahrenheit 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.

**C. 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 than 50 degrees Fahrenheit 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 dust collector 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 dust collector for each day of operation, and

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- 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 solvent-based paint production:
  - 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.

**D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports which identify deviations (excursions) associated with the following emissions limitations and operational restrictions:
  - a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator 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.

## **E Testing Requirements**

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

- a. Emission Limitation:  
OC emissions shall not exceed 4.9 lbs/batch.

**Applicable Compliance Method:**

Compliance shall be determined by the Air Pollutant Emissions Module (APEM) based on PlantWare Batch Recipes (Sherwin-Williams, March 1999) 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", assuming 90% capture and 98% destruction efficiency confirmed through testing. 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 ft<sup>3</sup>/lbmol R;  $850$  ft<sup>3</sup>/min;  $T = 565R$  (105 F);  $t = 30$  min;  $sf = 8\%$ ;  $(0.5416 \text{ psia}(1 \text{ mol}) 850 \text{ ft}^3/\text{min} (96.83 \text{ lb/mol}) 30 \text{ min} (0.08))/10.731 \text{ psia ft}^3/\text{lbmol R} (565 \text{ R}) = 17.65$  lbs OC emitted (1 - 0.95 control) = 0.88 lb OC (stack) plus  $(17.65/0.9) \times (1 - 0.9) = 1.96$  lbs OC (fugitive) = 2.84 lbs OC max (0.5 hr) emission. Therefore, compliance with the batch emission limitation is assumed as long as the permittee does not manufacture a coating that results in more emission than the "worse case" coating and the thermal incinerator combustion chamber temperature is operated within the applicable 3-hour average combustion temperature range.

- b. Emission Limitation:  
OC emissions shall not exceed 4.9 tons/yr.

**Applicable Compliance Method:**

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

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

**Applicable Compliance Method:**

Compliance shall be demonstrated through monitoring and record keeping found in section C.2.

- d. Emissions Limitation:  
PE shall not exceed 0.97 ton per year.

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Applicable Compliance Method:

Compliance with the annual emission limitation shall be assumed as long as the emission unit complies with the hourly limit.

## e. Emissions 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).

**F. Miscellaneous Requirements**

1. The restrictions on the potential to emit for individual hazardous air pollutants (IHAP), total combined hazardous air pollutants (TCHAP) and organic compounds (OC) established under OAC rule 3745-31-05(C) are as follows for the emissions units listed in term F.2 below:
  - a. the IHAP and TCHAP emissions shall not exceed 9.9 tons and 24.9 tons per rolling, 12-month period, respectively, and
  - b. the total OC emissions shall not exceed 99.9 tons per rolling, 12- month period.
2. The operational restriction on the potential to emit for IHAP, TCHAP and OC that establish federally enforceable limitations are as follows:
  - a. the permittee shall capture 90% of all OC emissions from solvent-based high speed dispersers in emission units identified as P013, P014, P016, P017, P021, P022, P023, P024, P025, P026, P027, P117, P118, P138, P170, P171 and P172 with venting to a regenerative thermal oxidizer (RTO) that achieves a minimum 95% destruction of O; and
  - b. the permittee shall capture 100% of all OC emissions from solvent-based thin and shade tanks in emission units identified as P047, P048, P049, P050, P051, P052, P053, P054, P055, P056, P057, P058, P059, P060, P061, P062, P063, P064, P065, P066, P067, P068, P069, P070, P071, P072, P073, P074, P075, P076, P103, P104, P105, P106, P107, P108, P109, P110, P111, P112, P113, P114, P115, P116, P120, P144, P145, P146, P147, P148, P149, P150, P154, P155, P156, P160, P161, P162, P163, P164, P165, P173, P174, P175, P176, P177, and P178 with venting to a control device that achieves a minimum 95%

removal of OC emissions.

3. The permittee shall maintain the following monthly records, as maintained in a spreadsheet on-site, to document compliance with the restrictions to potential to emit for OC, IHAP, and TCHAP for emissions units P013, P014, P016, P017, P021, P022, P023, P024, P025, P026, P027, P117, P118, P138, P170, P171, P172, P047, P048, P049, P050, P051, P052, P053, P054, P055, P056, P057, P058, P059, P060, P061, P062, P063, P064, P065, P066, P067, P068, P069, P070, P071, P072, P073, P074, P075, P076, P103, P104, P105, P106, P107, P108, P109, P110, P111, P112, P113, P114, P115, P116, P120, P146, P147, P148, P149, P150, P160, P161, P162, P163, P164, P165, P173, P174, P175, P176, P177, and P178 are as follows:
  - a. the calculated OC emissions rate for the current month, in pounds or tons;
  - b. the rolling, 12-month summation of OC emissions (i.e., the OC emissions from the current month added to the summation of the OC emissions from the previous 11 months);
  - c. the calculated IHAP emissions rate for the current month, in pounds or tons;
  - d. the calculated TCHAP emissions rate for the current month, in pounds or tons;
  - e. the rolling 12-month summation of IHAP emissions (i.e., the IHAP emissions from the current month added to the summation of the IHAP emissions from the previous 11 months); and
  - f. the rolling 12-month summation of TCHAP emissions (i.e., the TCHAP emissions from the current month added to the summation of the TCHAP emissions from the previous 11 months).
4. The permittee shall submit quarterly deviation (excursion) reports for deviations (excursions) associated with exceedances of the following emission limitations and operational restrictions:
  - a. the rolling 12-month IHAP and TCHAP emission limitations; and
  - b. the rolling, 12-month OC emission limitation.

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

5. Compliance with the emission limitations in Part II, section F.1 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:  
The IHAP and TCHAP emissions shall not exceed 9.9 tons and 24.9 tons per

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rolling, 12-month period, respectively.

Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping requirements specified in section F.3 of this permit.

b. Emission Limitation:

The total OC emissions shall not exceed 99.9 tons per rolling, 12- month period.

Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping requirements specified in section F.3 of this permit.

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

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
P172 - 750 gallon high speed disperser (HSD) for solvent-based coating production vented to a baghouse and a thermal oxidizer (418)	OAC rule 3745-31-05(A)(3)	OAC rule 3745-17-11(A)
		OAC rule 3745-31-05(C) (synthetic minor to avoid non-attainment new source review)
		OAC rule 3745-35-07(B) (synthetic minor to avoid TV and MACT)
	OAC rule 3745-21-07(G)(2)	
	OAC rule 3745-17-07(A)(1)	

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Applicable Emissions  
Limitations/Control  
Measures

Organic Compounds (OC) emissions shall not exceed 3.68 lbs/batch and 4.0 tons/yr. See sections A.2.a and A.2.d below.

Particulate emissions (PE) shall not exceed 0.22 lb/hr and 0.97 ton/yr. See sections A.2.b and A.2.c 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 requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(C) and 3745-35-07(B).

The emission limitation specified by this rule is less stringent than limit established pursuant OAC rule 3745-31-05(A)(3).

The emission limitation specified by this rule is less stringent than limit established pursuant OAC rule 3745-31-05(A)(3).

The emission limitation specified by this rule is less stringent than limit established pursuant OAC rule 3745-31-05(A)(3).

See sections A.2.a, A.2.d, B.3, F.1.b and F.2 below.

See section A.2.a, A.2.e, F.1, and F.2 below.

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- 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 3.68 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 "worst case coating" at a 4 hour batch period and a 800 gallon batch size at a maximum "worst case" emission rate of 8.84 lbs OC/1,800 gallons batch assuming formulation calculations in the applicant's air permit to install application. The annual emission limitation is based on 168 batches per month based on supplemental information provided by the applicant. Therefore, compliance with the annual emission limitation is assumed as long as the permittee does not exceed the 168 batch per month operational restriction or manufactures a coating that results in more emission than the "worse case" coating.
- 2.e** The restrictions to potential to emit (PTE) for emission units at this facility, as maintained in a spreadsheet on-site, will ensure that the individual hazardous air pollutant (IHAP), and total combined hazardous air pollutant (TCHAP) and organic compound (OC), emissions will not exceed the Title V and MACT applicability thresholds of 10 tons IHAP and/or 25 tons TCHAP emissions and 100 tons OC per rolling, 12-month period, respectively.

Therefore, the permittee, by complying with the federally enforceable facility specific terms and conditions specified in Part II.A.2 for listed emission units will not be subject to Title V permitting and provisions in the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Miscellaneous Coating Manufacturing 40 CFR Part 63 Subpart HHHHH.

<sup>1</sup>A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact.

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Material Safety Data Sheets typically include a listing of the solvents contained in the adhesive/coatings and clean up materials. This information does not have to be kept on a line-by-line basis.

**B. 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 Fahrenheit 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.

**C. Monitoring and/or Record keeping 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 than 50 degrees Fahrenheit 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 dust collector while the emissions unit is in operation. The monitoring

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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 dust collector 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 solvent-based paint production:
- 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.

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

1. The permittee shall submit quarterly deviation (excursion) reports which identify deviations (excursions) associated with the following emissions limitations and operational restrictions:
  - a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator 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

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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.

**E. Testing Requirements**

1. Compliance with the emission limitations in section A.1 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:  
OC emissions shall not exceed 3.68 lbs/batch.

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**Applicable Compliance Method:**

Compliance shall be determined by the Air Pollutant Emissions Module (APEM) based on PlantWare Batch Recipes (Sherwin-Williams, March 1999) 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" assuming 100% capture and 95% control 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 ft<sup>3</sup>/lbmol R;  $850$  ft<sup>3</sup>/min;  $T = 565R$  (105 F);  $t = 30$  min;  $sf = 8\%$ ;  $(0.5416 \text{ psia}(1 \text{ mol}) 850 \text{ ft}^3/\text{min} (96.83 \text{ lb/mol}) 30 \text{ min} (0.08))/10.731 \text{ psia ft}^3/\text{lbmol R} (565 \text{ R}) = 17.65$  lbs OC emitted  $(1 - 0.95 \text{ control}) = 0.88$  lb OC (stack) plus  $(17.65/0.9) \times (1 - 0.9) = 1.96$  lbs OC (fugitive) = 2.84 lbs OC max (0.5 hr) emission. Therefore, compliance with the batch emission limitation is assumed as long as the permittee does not manufacture a coating that results in more emission than the "worse case" coating and the thermal incinerator combustion chamber temperature is operated within the applicable 3-hour average combustion temperature range.

- 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 the 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 through monitoring and record keeping found in section C.2.

- d. Emission Limitation:  
PE shall not exceed 0.97 ton per year.

**Applicable Compliance Method:**

Compliance with the annual emission limitation shall be assumed as long as the emission unit complies with the hourly limit.

- 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,

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Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

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1. The restrictions on the potential to emit for individual hazardous air pollutants (IHAP), total combined hazardous air pollutants (TCHAP) and organic compounds (OC) established under OAC rule 3745-31-05(C) are as follows for the emissions units listed in term F.2 below:
  - a. the IHAP and TCHAP emissions shall not exceed 9.9 tons and 24.9 tons per rolling, 12-month period, respectively, and
  - b. the total OC emissions shall not exceed 99.9 tons per rolling, 12-month period.
2. The operational restriction on the potential to emit for IHAP, TCHAP and OC that establish federally enforceable limitations are as follows:
  - a. the permittee shall capture 90% of all OC emissions from solvent-based high speed dispersers in emission units identified as P013, P014, P016, P017, P021, P022, P023, P024, P025, P026, P027, P117, P118, P138, P170, P171 and P172 with venting to a regenerative thermal oxidizer (RTO) that achieves a minimum 95% destruction of O; and
  - b. the permittee shall capture 100% of all OC emissions from solvent-based thin and shade tanks in emission units identified as P047, P048, P049, P050, P051, P052, P053, P054, P055, P056, P057, P058, P059, P060, P061, P062, P063, P064, P065, P066, P067, P068, P069, P070, P071, P072, P073, P074, P075, P076, P103, P104, P105, P106, P107, P108, P109, P110, P111, P112, P113, P114, P115, P116, P120, P144, P145, P146, P147, P148, P149, P150, P154, P155, P156, P160, P161, P162, P163, P164, P165, P173, P174, P175, P176, P177, and P178 with venting to a control device that achieves a minimum 95% removal of OC emissions.
3. The permittee shall maintain the following monthly records, as maintained in a spreadsheet on-site, to document compliance with the restrictions to potential to emit for OC, IHAP, and TCHAP for emissions units P013, P014, P016, P017, P021, P022, P023, P024, P025, P026, P027, P117, P118, P138, P170, P171, P172, P047, P048, P049, P050, P051, P052, P053, P054, P055, P056, P057, P058, P059, P060, P061, P062, P063, P064, P065, P066, P067, P068, P069, P070, P071, P072, P073, P074, P075, P076, P103, P104, P105, P106, P107, P108, P109, P110, P111, P112, P113, P114, P115, P116, P120, P146, P147, P148, P149, P150, P160, P161, P162, P163, P164, P165, P173, P174, P175, P176, P177, and P178 are as follows:

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- a. the calculated OC emissions rate for the current month, in pounds or tons;
  - b. the rolling, 12-month summation of OC emissions (i.e., the OC emissions from the current month added to the summation of the OC emissions from the previous 11 months);
  - c. the calculated IHAP emissions rate for the current month, in pounds or tons;
  - d. the calculated TCHAP emissions rate for the current month, in pounds or tons;
  - e. the rolling 12-month summation of IHAP emissions (i.e., the IHAP emissions from the current month added to the summation of the IHAP emissions from the previous 11 months); and
  - f. the rolling 12-month summation of TCHAP emissions (i.e., the TCHAP emissions from the current month added to the summation of the TCHAP emissions from the previous 11 months).
4. The permittee shall submit quarterly deviation (excursion) reports for deviations (excursions) associated with exceedances of the following emission limitations and operational restrictions:
    - a. the rolling 12-month IHAP and TCHAP emission limitations; and
    - b. the rolling, 12-month OC emission limitation.

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

5. Compliance with the emission limitations in Part II, section F.1 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:  
The IHAP and TCHAP emissions shall not exceed 9.9 tons and 24.9 tons per rolling, 12-month period, respectively.  
  
Applicable Compliance Method:  
Compliance shall be demonstrated by the record keeping requirements specified in section F.3 of this permit.
  - b. Emission Limitation:  
The total OC emissions shall not exceed 99.9 tons per rolling, 12-month period.  
  
Applicable Compliance Method:  
Compliance shall be demonstrated by the record keeping requirements specified in section F.3 of this permit.

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

Emissions Unit ID: **P172**

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Emissions Unit ID: P172

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

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P173 - 1,000 gallon thin and shade tank for solvent-based coating production vented to zeolite cannister (501)	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 0.34 lb/batch and 0.03 ton/yr. See section A.2.a below.
	OAC rule 3745-21-07(G)(2)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(C) and 3745-35-07(B).
	OAC rule 3745-31-05(C) (synthetic minor to avoid non-attainment new source review)	The emission limitation specified by this rule is equivalent or less stringent than the limit established pursuant OAC rule 3745-31-05(A)(3).
	OAC rule 3745-35-07(B) (synthetic minor to avoid TV and MACT)	See sections A.2.a, B1, B.2, F.1.b and F.2 below.
		See section A.2.a, A.2.b, F.1, and F.2 below.

**2. Additional Terms and Conditions**

- 2.a The 0.34 lb OC/batch and 0.03 ton OC/yr emission limitations were established

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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 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.

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- 2.b** The restrictions to potential to emit (PTE) for emission units at this facility, as maintained in a spreadsheet on-site, will ensure that the individual hazardous air pollutant (IHAP), and total combined hazardous air pollutant (TCHAP) and organic compound (OC), emissions will not exceed the Title V and MACT applicability thresholds of 10 tons IHAP and/or 25 tons TCHAP emissions and 100 tons OC per rolling, 12-month period, respectively.

Therefore, the permittee, by complying with the federally enforceable facility specific terms and conditions specified in Part II.A.2 for listed emission units will not be subject to Title V permitting and provisions in the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Miscellaneous Coating Manufacturing 40 CFR Part 63 Subpart HHHHH.

<sup>1</sup>A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the adhesive/coatings and clean up materials. This information does not have to be kept on a line-by-line basis.

**B. Operational Restrictions**

1. All OC emissions generated during pump-in and solvent blending in this emissions unit shall be vented to a control device that achieves a minimum 95% removal of OC emissions.
2. The permittee shall not blend and pump to a fill line more than 15 batches of coating per month from this emission unit.

**C. Monitoring and/or Record keeping 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

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coating; and

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

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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.

**E. 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.

**E. Testing Requirements**

1. Compliance with the emission limitations in section A.1. of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:  
OC emissions shall not exceed 0.34 lb/batch.

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**Applicable Compliance Method:**

Compliance shall be determined by the Air Pollutant Emissions Module (APEM) based on PlantWare Batch Recipes (Sherwin-Williams, March 1999) 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" assuming 100% capture and 95% control efficiency.  $E = \frac{P(X)V(MW)}{RT}$ : Where  $P = 0.9364$  psia;  $MW = 96.66$  lb/mol;  $X = 1$  mole;  $R = 10.731$  psia ft<sup>3</sup> /lbmol R;  $V = 241$  ft<sup>3</sup>;  $T = 585$  R (125 F);  $E = \frac{0.9364 \text{ psia} (1 \text{ mole}) 241 \text{ ft}^3 (96.66 \text{ lb/mol})}{10.731 \text{ psia ft}^3 / \text{lbmol R} (585 \text{ R})} = 3.47 \text{ lbs} * (1 - 0.95) = 0.17 \text{ lb OC}$ . Therefore, compliance with the batch emission limitation is assumed as long as the permittee does not manufacture a coating that results in more emission than the "worse case" coating and the permittee monitors 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.

- b. Emission Limitation:  
OC emissions shall not exceed 0.03 ton/yr.

**Applicable Compliance Method:**

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

**F. Miscellaneous Requirements**

1. The restrictions on the potential to emit for individual hazardous air pollutants (IHAP), total combined hazardous air pollutants (TCHAP) and organic compounds (OC) established under OAC rule 3745-31-05(C) are as follows for the emissions units listed in term F.2 below:
  - a. the IHAP and TCHAP emissions shall not exceed 9.9 tons and 24.9 tons per rolling, 12-month period, respectively, and
  - b. the total OC emissions shall not exceed 99.9 tons per rolling, 12-month period.
2. The operational restriction on the potential to emit for IHAP, TCHAP and OC that establish federally enforceable limitations are as follows:
  - a. the permittee shall capture 90% of all OC emissions from solvent-based high speed dispersers in emission units identified as P013, P014, P016, P017, P021, P022, P023, P024, P025, P026, P027, P117, P118, P138, P170, P171 and P172 with venting to a regenerative thermal oxidizer (RTO) that achieves a minimum 95% destruction of O; and
  - b. the permittee shall capture 100% of all OC emissions from solvent-based thin

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and shade tanks in emission units identified as P047, P048, P049, P050, P051, P052, P053, P054, P055, P056, P057, P058, P059, P060, P061, P062, P063, P064, P065, P066, P067, P068, P069, P070, P071, P072, P073, P074, P075, P076, P103, P104, P105, P106, P107, P108, P109, P110, P111, P112, P113, P114, P115, P116, P120, P144, P145, P146, P147, P148, P149, P150, P154, P155, P156, P160, P161, P162, P163, P164, P165, P173, P174, P175, P176, P177, and P178 with venting to a control device that achieves a minimum 95% removal of OC emissions.

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3. The permittee shall maintain the following monthly records, as maintained in a spreadsheet on-site, to document compliance with the restrictions to potential to emit for OC, IHAP, and TCHAP for emissions units P013, P014, P016, P017, P021, P022, P023, P024, P025, P026, P027, P117, P118, P138, P170, P171, P172, P047, P048, P049, P050, P051, P052, P053, P054, P055, P056, P057, P058, P059, P060, P061, P062, P063, P064, P065, P066, P067, P068, P069, P070, P071, P072, P073, P074, P075, P076, P103, P104, P105, P106, P107, P108, P109, P110, P111, P112, P113, P114, P115, P116, P120, P146, P147, P148, P149, P150, P160, P161, P162, P163, P164, P165, P173, P174, P175, P176, P177, and P178 are as follows:
  - a. the calculated OC emissions rate for the current month, in pounds or tons;
  - b. the rolling, 12-month summation of OC emissions (i.e., the OC emissions from the current month added to the summation of the OC emissions from the previous 11 months);
  - c. the calculated IHAP emissions rate for the current month, in pounds or tons;
  - d. the calculated TCHAP emissions rate for the current month, in pounds or tons;
  - e. the rolling 12-month summation of IHAP emissions (i.e., the IHAP emissions from the current month added to the summation of the IHAP emissions from the previous 11 months); and
  - f. the rolling 12-month summation of TCHAP emissions (i.e., the TCHAP emissions from the current month added to the summation of the TCHAP emissions from the previous 11 months).
4. The permittee shall submit quarterly deviation (excursion) reports for deviations (excursions) associated with exceedances of the following emission limitations and operational restrictions:
  - a. the rolling 12-month IHAP and TCHAP emission limitations; and
  - b. the rolling, 12-month OC emission limitation.

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

5. Compliance with the emission limitations in Part II, section F.1 of these terms and

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conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:  
The IHAP and TCHAP emissions shall not exceed 9.9 tons and 24.9 tons per rolling, 12-month period, respectively.

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Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping requirements specified in section F.3 of this permit.

b. Emission Limitation:

The total OC emissions shall not exceed 99.9 tons per rolling, 12- month period.

Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping requirements specified in section F.3 of this permit.

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

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P174 - 1,000 gallon thin and shade tank for solvent-based coating production vented to a zeolite cannister (502)	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 0.34 lb/batch and 0.03 ton/yr. See section A.2.a below.
	OAC rule 3745-21-07(G)(2)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(C) and 3745-35-07(B).  The emission limitation specified by this rule is equivalent or less stringent than the limit established pursuant OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(C) (synthetic minor to avoid non-attainment new source review)	See sections A.2.a, B1, B.2, F.1.b and F.2 below.
	OAC rule 3745-35-07(B) (synthetic minor to avoid TV and MACT)	See section A.2.a, A.2.b, F.1, and F.2 below.

**2. Additional Terms and Conditions**

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- 2.a** The 0.34 lb OC/batch and 0.03 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.

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Therefore, compliance with the 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** The facility-wide individual and combined hazardous air pollutant (HAP)<sup>1</sup> emissions shall not exceed 9.9 tons and 24.9 tons per rolling, 12-month period, respectively, by limiting the total HAP emissions from all emissions units. The permittee shall restrict total facility OC emissions to less than 99.9 tons per rolling, 12- month period.

Therefore, the permittee, by complying with the federally enforceable facility specific terms and conditions specified in Part II.A.2 for listed emission units will not be subject to Title V permitting and provisions in the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Miscellaneous Coating Manufacturing 40 CFR Part 63 Subpart HHHHH.

<sup>1</sup>A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the adhesive/coatings and clean up materials. This information does not have to be kept on a line-by-line basis.

**B. Operational Restrictions**

1. All OC emissions generated during pump-in and solvent blending in this emissions unit shall vented to a control device that achieves a minimum 95% removal of OC emissions.
2. The permittee shall not blend and pump to a fill line more than 15 batches of coating per month from this emission unit.

**C. Monitoring and/or Record keeping 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;

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- 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

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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.

**D. 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.

**E. Testing Requirements**

1. Compliance with the emission limitations in section A.1 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:  
OC emissions shall not exceed 0.34 lb/batch.

Applicable Compliance Method:

Compliance shall be determined by the Air Pollutant Emissions Module (APEM) based on PlantWare Batch Recipes (Sherwin-Williams, March 1999) using the

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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" assuming 100% capture and 95% control efficiency.  $E = \frac{P(X)V(MW)}{RT}$ : Where  $P = 0.9364$  psia;  $MW = 96.66$  lb/mol;  $X = 1$  mole;  $R = 10.731$  psia ft<sup>3</sup> /lbmol R;  $V = 241$  ft<sup>3</sup>;  $T = 585$  R (125 F);  $E = \frac{0.9364 \text{ psia} (1 \text{ mole}) 241 \text{ ft}^3 (96.66 \text{ lb/mol})}{10.731 \text{ psia ft}^3 / \text{lbmol R} (585 \text{ R})} = 3.47 \text{ lbs} * (1 - 0.95) = 0.17 \text{ lb OC}$ . Therefore, compliance with the batch emission limitation is assumed as long as the permittee does not manufacture a coating that results in more emission than the "worse case" coating and the permittee monitors 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.

- b. Emission Limitation:  
OC emissions shall not exceed 0.03 ton per year.

Applicable Compliance Method:

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

**F. Miscellaneous Requirements**

1. The restrictions on the potential to emit for individual hazardous air pollutants (IHAP), total combined hazardous air pollutants (TCHAP) and organic compounds (OC) established under OAC rule 3745-31-05(C) are as follows for the emissions units listed in term F.2 below:
  - a. the IHAP and TCHAP emissions shall not exceed 9.9 tons and 24.9 tons per rolling, 12-month period, respectively, and
  - b. the total OC emissions shall not exceed 99.9 tons per rolling, 12-month period.
2. The operational restriction on the potential to emit for IHAP, TCHAP and OC that establish federally enforceable limitations are as follows:
  - a. the permittee shall capture 90% of all OC emissions from solvent-based high speed dispersers in emission units identified as P013, P014, P016, P017, P021, P022, P023, P024, P025, P026, P027, P117, P118, P138, P170, P171 and P172 with venting to a regenerative thermal oxidizer (RTO) that achieves a minimum 95% destruction of O; and

- b. the permittee shall capture 100% of all OC emissions from solvent-based thin and shade tanks in emission units identified as P047, P048, P049, P050, P051, P052, P053, P054, P055, P056, P057, P058, P059, P060, P061, P062, P063, P064, P065, P066, P067, P068, P069, P070, P071, P072, P073, P074, P075, P076, P103, P104, P105, P106, P107, P108, P109, P110, P111, P112, P113, P114, P115, P116, P120, P144, P145, P146, P147, P148, P149, P150, P154, P155, P156, P160, P161, P162, P163, P164, P165, P173, P174, P175, P176, P177, and P178 with venting to a control device that achieves a minimum 95% removal of OC emissions.
3. The permittee shall maintain the following monthly records, as maintained in a spreadsheet on-site, to document compliance with the restrictions to potential to emit for OC, IHAP, and TCHAP for emissions units P013, P014, P016, P017, P021, P022, P023, P024, P025, P026, P027, P117, P118, P138, P170, P171, P172, P047, P048, P049, P050, P051, P052, P053, P054, P055, P056, P057, P058, P059, P060, P061, P062, P063, P064, P065, P066, P067, P068, P069, P070, P071, P072, P073, P074, P075, P076, P103, P104, P105, P106, P107, P108, P109, P110, P111, P112, P113, P114, P115, P116, P120, P146, P147, P148, P149, P150, P160, P161, P162, P163, P164, P165, P173, P174, P175, P176, P177, and P178 are as follows:
  - a. the calculated OC emissions rate for the current month, in pounds or tons;
  - b. the rolling, 12-month summation of OC emissions (i.e., the OC emissions from the current month added to the summation of the OC emissions from the previous 11 months);
  - c. the calculated IHAP emissions rate for the current month, in pounds or tons;
  - d. the calculated TCHAP emissions rate for the current month, in pounds or tons;
  - e. the rolling 12-month summation of IHAP emissions (i.e., the IHAP emissions from the current month added to the summation of the IHAP emissions from the previous 11 months); and
  - f. the rolling 12-month summation of TCHAP emissions (i.e., the TCHAP emissions from the current month added to the summation of the TCHAP emissions from the previous 11 months).
4. The permittee shall submit quarterly deviation (excursion) reports for deviations (excursions) associated with exceedances of the following emission limitations and operational restrictions:
  - a. the rolling 12-month IHAP and TCHAP emission limitations; and
  - b. the rolling, 12-month OC emission limitation.

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

5. Compliance with the emission limitations in Part II, section F.1 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

The IHAP and TCHAP emissions shall not exceed 9.9 tons and 24.9 tons per rolling, 12-month period, respectively.

Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping requirements specified in section F.3 of this permit.

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- b. Emission Limitation:  
The total OC emissions shall not exceed 99.9 tons per rolling, 12- month period.  
  
Applicable Compliance Method:  
Compliance shall be demonstrated by the record keeping requirements specified in section F.3 of this permit.

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Emissions Unit ID: P175

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**Part II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P175 - 2,000 gallon thin and shade tank for solvent-based coating production vented to a zeolite cannister (503)	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 0.67 lb/batch and 0.06 ton per year. See section A.1.2.a below.  The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G)(2) and 3745-35-07(B).
	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(A)(3).
	OAC rule 3745-31-05(C) (synthetic minor to avoid non-attainment new source review)	See sections A.2.a, B1, B.2, F.1.b and F.2 below.
	OAC rule 3745-35-07(B) (synthetic minor to avoid TV and MACT)	See section A.2.a, A.2.b, F.1, and F.2 below.

**2. Additional Terms and Conditions**

- 2.a The 0.67 lb OC/batch and 0.06 ton OC/yr emission limitations were established

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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 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.

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- 2.b** The restrictions to potential to emit (PTE) for emission units at this facility, as maintained in a spreadsheet on-site, will ensure that the individual hazardous air pollutant (IHAP), and total combined hazardous air pollutant (TCHAP) and organic compound (OC), emissions will not exceed the Title V and MACT applicability thresholds of 10 tons IHAP and/or 25 tons TCHAP emissions and 100 tons OC per rolling, 12-month period, respectively..

Therefore, the permittee, by complying with the federally enforceable facility specific terms and conditions specified in Part II.A.2 for listed emission units will not be subject to Title V permitting and provisions in the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Miscellaneous Coating Manufacturing 40 CFR Part 63 Subpart HHHHH.

<sup>1</sup>A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the adhesive/coatings and clean up materials. This information does not have to be kept on a line-by-line basis.

**B. Operational Restrictions**

1. All OC emissions generated during pump-in and solvent blending in this emissions unit shall vented to a control device that achieves a minimum 95% removal of OC emissions.
2. The permittee shall not blend and pump to a fill line more than 15 batches of coating per month from this emission unit.

**C. Monitoring and/or Record keeping 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

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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.

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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.

**D. 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.

**E. Testing Requirements**

1. Compliance with the emission limitations in section A.1 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 the Air Pollutant Emissions Module (APEM) based on PlantWare Batch Recipes (Sherwin-Williams, March 1999) 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" assuming 100% capture and 95% control

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efficiency.  $E = \frac{P(X)V(MW)}{RT}$ : Where  $P = 0.9364$  psia;  $MW = 96.66$  lb/mol;  $X = 1$  mole;  $R = 10.731$  psia ft<sup>3</sup> /lbmol R;  $V = 241$  ft<sup>3</sup>;  $T = 585$  R (125 F);  $E = \frac{0.9364 \text{ psia (1 mole) } 241 \text{ ff3 (96.66 lb/mol)}}{10.731 \text{ psia ft}^3 / \text{lbmol R (585 R)}} = 3.47 \text{ lbs} * (1 - 0.95) = 0.17 \text{ lb OC}$ . Therefore, compliance with the batch emission limitation is assumed as long as the permittee does not manufacture a coating that results in more emission than the "worse case" coating and the permittee monitors for OC concentrations at a

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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.

- 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 the monthly batch emission restriction because the emission is based on the maximum potential to emit.

**F. Miscellaneous Requirements**

1. The restrictions on the potential to emit for individual hazardous air pollutants (IHAP), total combined hazardous air pollutants (TCHAP) and organic compounds (OC) established under OAC rule 3745-31-05(C) are as follows for the emissions units listed in term F.2 below:
  - a. the IHAP and TCHAP emissions shall not exceed 9.9 tons and 24.9 tons per rolling, 12-month period, respectively, and
  - b. the total OC emissions shall not exceed 99.9 tons per rolling, 12-month period.
2. The operational restriction on the potential to emit for IHAP, TCHAP and OC that establish federally enforceable limitations are as follows:
  - a. the permittee shall capture 90% of all OC emissions from solvent-based high speed dispersers in emission units identified as P013, P014, P016, P017, P021, P022, P023, P024, P025, P026, P027, P117, P118, P138, P170, P171 and P172 with venting to a regenerative thermal oxidizer (RTO) that achieves a minimum 95% destruction of O; and
  - b. the permittee shall capture 100% of all OC emissions from solvent-based thin and shade tanks in emission units identified as P047, P048, P049, P050, P051, P052, P053, P054, P055, P056, P057, P058, P059, P060, P061, P062, P063, P064, P065, P066, P067, P068, P069, P070, P071, P072, P073, P074, P075, P076, P103, P104, P105, P106, P107, P108, P109, P110, P111, P112, P113, P114, P115, P116, P120, P144, P145, P146, P147, P148, P149, P150, P154, P155, P156, P160, P161, P162, P163, P164, P165, P173, P174, P175, P176, P177, and P178 with venting to a control device that achieves a minimum 95% removal of OC emissions.

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3. The permittee shall maintain the following monthly records, as maintained in a spreadsheet on-site, to document compliance with the restrictions to potential to emit for OC, IHAP, and TCHAP for emissions units P013, P014, P016, P017, P021, P022, P023, P024, P025, P026, P027, P117, P118, P138, P170, P171, P172, P047, P048, P049, P050, P051, P052, P053, P054, P055, P056, P057, P058, P059, P060, P061, P062, P063, P064, P065, P066, P067, P068, P069, P070, P071, P072, P073, P074, P075, P076, P103, P104, P105, P106, P107, P108, P109, P110, P111, P112, P113, P114, P115, P116, P120, P146, P147, P148, P149, P150, P160, P161, P162, P163, P164, P165, P173, P174, P175, P176, P177, and P178 are as follows:
  - a. the calculated OC emissions rate for the current month, in pounds or tons;
  - b. the rolling, 12-month summation of OC emissions (i.e., the OC emissions from the current month added to the summation of the OC emissions from the previous 11 months);
  - c. the calculated IHAP emissions rate for the current month, in pounds or tons;
  - d. the calculated TCHAP emissions rate for the current month, in pounds or tons;
  - e. the rolling 12-month summation of IHAP emissions (i.e., the IHAP emissions from the current month added to the summation of the IHAP emissions from the previous 11 months); and
  - f. the rolling 12-month summation of TCHAP emissions (i.e., the TCHAP emissions from the current month added to the summation of the TCHAP emissions from the previous 11 months).
4. The permittee shall submit quarterly deviation (excursion) reports for deviations (excursions) associated with exceedances of the following emission limitations and operational restrictions:
  - a. the rolling 12-month IHAP and TCHAP emission limitations; and
  - b. the rolling, 12-month OC emission limitation.

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

5. Compliance with the emission limitations in Part II, section F.1 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:  
The IHAP and TCHAP emissions shall not exceed 9.9 tons and 24.9 tons per rolling, 12-month period, respectively.

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Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping requirements specified in section F.3 of this permit.

b. Emission Limitation:

The total OC emissions shall not exceed 99.9 tons per rolling, 12- month period.

Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping requirements specified in section F.3 of this permit.

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

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

- 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
P176 - 2,000 gallon thin and shade tank for solvent-based coating production vented to a zeolite cannister (504)	OAC rule 3745-31-05(A)(3)	OAC rule 3745-31-05(C) (synthetic minor to avoid non-attainment new source review)
	OAC rule 3745-21-07(G)(2)	OAC rule 3745-35-07(B) (synthetic minor to avoid TV and MACT)

Applicable Emissions  
Limitations/Control  
Measures

Organic compound (OC) emissions shall not exceed 0.67 lb/batch and 0.06 ton/yr. See section A.2.a below.

The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(C) and 3745-35-07(B).

The emission limitation specified by this rule is equivalent or less stringent than the limit established pursuant OAC rule 3745-31-05(A)(3).

See sections A.2.a, B1, B.2, F.1.b and F.2 below.

See section A.2.a, A.2.b, F.1, and F.2 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 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.

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- 2.b** The restrictions to potential to emit (PTE) for emission units at this facility, as maintained in a spreadsheet on-site, will ensure that the individual hazardous air pollutant (IHAP), and total combined hazardous air pollutant (TCHAP) and organic compound (OC), emissions will not exceed the Title V and MACT applicability thresholds of 10 tons IHAP and/or 25 tons TCHAP emissions and 100 tons OC per rolling, 12-month period, respectively.

Therefore, the permittee, by complying with the federally enforceable facility specific terms and conditions specified in Part II.A.2 for listed emission units will not be subject to Title V permitting and provisions in the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Miscellaneous Coating Manufacturing 40 CFR Part 63 Subpart HHHHH.

<sup>1</sup>A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the adhesive/coatings and clean up materials. This information does not have to be kept on a line-by-line basis.

**B. 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 a fill line more than 15 batches of coating per month from this emission unit.

**C. Monitoring and/or Record keeping 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

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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.

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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.

**D. 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.

**E. Testing Requirements**

1. Compliance with the emission limitations in section A.1 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 the Air Pollutant Emissions Module (APEM) based on PlantWare Batch Recipes (Sherwin-Williams, March 1999) using the method described in the Emission Inventory Improvement Program (EIIP), Chapter 8 "Preferred and Alternative Methods for Estimating Air Emissions from

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Paint and Ink Manufacturing Facilities" assuming 100% capture and 95% control efficiency.  $E = \frac{P(X)V(MW)}{RT}$ : Where  $P = 0.9364$  psia;  $MW = 96.66$  lb/mol;  $X = 1$  mole;  $R = 10.731$  psia ft<sup>3</sup>/lbmol R;  $V = 241$  ft<sup>3</sup>;  $T = 585$  R (125 F);  $E = \frac{0.9364 \text{ psia} (1 \text{ mole}) 241 \text{ ft}^3 (96.66 \text{ lb/mol})}{10.731 \text{ psia ft}^3 / \text{lbmol R} (585 \text{ R})} = 3.47 \text{ lbs} * (1 - 0.95) = 0.17 \text{ lb OC}$ . Therefore, compliance with the batch emission limitation is assumed as long as the permittee does not manufacture a coating that results in more emission than the "worse case" coating and the permittee monitors 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.

- 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 the monthly batch emission restriction because the emission is based on the maximum potential to emit.

## F. Miscellaneous Requirements

1. The restrictions on the potential to emit for individual hazardous air pollutants (IHAP), total combined hazardous air pollutants (TCHAP) and organic compounds (OC) established under OAC rule 3745-31-05(C) are as follows for the emissions units listed in term F.2 below:
  - a. the IHAP and TCHAP emissions shall not exceed 9.9 tons and 24.9 tons per rolling, 12-month period, respectively, and
  - b. the total OC emissions shall not exceed 99.9 tons per rolling, 12-month period.
2. The operational restriction on the potential to emit for IHAP, TCHAP and OC that establish federally enforceable limitations are as follows:
  - a. the permittee shall capture 90% of all OC emissions from solvent-based high speed dispersers in emission units identified as P013, P014, P016, P017, P021, P022, P023, P024, P025, P026, P027, P117, P118, P138, P170, P171 and P172 with venting to a regenerative thermal oxidizer (RTO) that achieves a minimum 95% destruction of O; and
  - b. the permittee shall capture 100% of all OC emissions from solvent-based thin and shade tanks in emission units identified as P047, P048, P049, P050, P051, P052, P053, P054, P055, P056, P057, P058, P059, P060, P061, P062, P063, P064, P065, P066, P067, P068, P069, P070, P071, P072, P073, P074, P075, P076, P103, P104, P105, P106, P107, P108, P109, P110, P111, P112, P113, P114, P115, P116, P120, P144, P145, P146, P147, P148, P149, P150, P154,

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P155, P156, P160, P161, P162, P163, P164, P165, P173, P174, P175, P176, P177, and P178 with venting to a control device that achieves a minimum 95% removal of OC emissions.

3. The permittee shall maintain the following monthly records, as maintained in a spreadsheet on-site, to document compliance with the restrictions to potential to emit for OC, IHAP, and TCHAP for emissions units P013, P014, P016, P017, P021, P022, P023, P024, P025, P026, P027, P117, P118, P138, P170, P171, P172, P047, P048, P049, P050, P051, P052, P053, P054, P055, P056, P057, P058, P059, P060, P061, P062, P063, P064, P065, P066, P067, P068, P069, P070, P071, P072, P073, P074, P075, P076, P103, P104, P105, P106, P107, P108, P109, P110, P111, P112, P113, P114, P115, P116, P120, P146, P147, P148, P149, P150, P160, P161, P162, P163, P164, P165, P173, P174, P175, P176, P177, and P178 are as follows:
  - a. the calculated OC emissions rate for the current month, in pounds or tons;
  - b. the rolling, 12-month summation of OC emissions (i.e., the OC emissions from the current month added to the summation of the OC emissions from the previous 11 months);
  - c. the calculated IHAP emissions rate for the current month, in pounds or tons;
  - d. the calculated TCHAP emissions rate for the current month, in pounds or tons;
  - e. the rolling 12-month summation of IHAP emissions (i.e., the IHAP emissions from the current month added to the summation of the IHAP emissions from the previous 11 months); and
  - f. the rolling 12-month summation of TCHAP emissions (i.e., the TCHAP emissions from the current month added to the summation of the TCHAP emissions from the previous 11 months).
4. The permittee shall submit quarterly deviation (excursion) reports for deviations (excursions) associated with exceedances of the following emission limitations and operational restrictions:
  - a. the rolling 12-month IHAP and TCHAP emission limitations; and
  - b. the rolling, 12-month OC emission limitation.

The quarterly deviation reports shall be submitted in accordance with the reporting

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requirements of the General Terms and Conditions of this permit.

5. Compliance with the emission limitations in Part II, section F.1 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

The IHAP and TCHAP emissions shall not exceed 9.9 tons and 24.9 tons per rolling, 12-month period, respectively.

Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping requirements specified in section F.3 of this permit.

- b. Emission Limitation:

The total OC emissions shall not exceed 99.9 tons per rolling, 12- month period.

Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping requirements specified in section F.3 of this permit.

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

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P177 - 4,000 gallon thin and shade tank for solvent-based coating production vented to zeolite cannister (505)	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 1.35 lbs/batch and 0.12 ton per year. See section A.2.a below.  The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(C) and 3745-35-07(B).
	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(A)(3).
	OAC rule 3745-31-05(C) (synthetic minor to avoid non-attainment new source review)	See sections A.2.a, B1, B.2, F.1.b and F.2 below.
	OAC rule 3745-35-07(B) (synthetic minor to avoid TV and MACT)	See section A.2.a, A.2.b, F.1, and F.2 below.

**2. Additional Terms and Conditions**

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- 2.a** The 1.35 lbs OC/batch and 0.12 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 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.

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- 2.b** The restrictions to potential to emit (PTE) for emission units at this facility, as maintained in a spreadsheet on-site, will ensure that the individual hazardous air pollutant (IHAP), and total combined hazardous air pollutant (TCHAP) and organic compound (OC), emissions will not exceed the Title V and MACT applicability thresholds of 10 tons IHAP and/or 25 tons TCHAP emissions and 100 tons OC per rolling, 12-month period, respectively..

Therefore, the permittee, by complying with the federally enforceable facility specific terms and conditions specified in Part II.A.2 for listed emission units will not be subject to Title V permitting and provisions in the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Miscellaneous Coating Manufacturing 40 CFR Part 63 Subpart HHHHH.

<sup>1</sup>A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the adhesive/coatings and clean up materials. This information does not have to be kept on a line-by-line basis.

**B. Operational Restrictions**

1. All OC emissions generated during pump-in and solvent blending in this emissions unit shall vented to a control device that achieves a minimum 95% removal of OC emissions.
2. The permittee shall not blend and pump to a fill line more than 15 batches of coating per month from this emission unit.

**C. Monitoring and/or Record keeping 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

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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.

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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.

**D. 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.

**E. Testing Requirements**

1. Compliance with the emission limitations in section A.1 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:  
OC emissions shall not exceed 1.35 lbs/batch.

**Applicable Compliance Method:**

Compliance shall be determined by the Air Pollutant Emissions Module (APEM) based on PlantWare Batch Recipes (Sherwin-Williams, March 1999) 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" assuming 100% capture and 95% control

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efficiency.  $E = \frac{P(X)V(MW)}{RT}$ : Where  $P = 0.9364$  psia;  $MW = 96.66$  lb/mol;  $X = 1$  mole;  $R = 10.731$  psia ft<sup>3</sup> /lbmol R;  $V = 241$  ft<sup>3</sup>;  $T = 585$  R (125 F);  $E = \frac{0.9364 \text{ psia} (1 \text{ mole}) 241 \text{ ff}^3 (96.66 \text{ lb/mol})}{10.731 \text{ psia ft}^3 / \text{lbmol R} (585 \text{ R})} = 3.47 \text{ lbs} * (1 - 0.95) = 0.17 \text{ lb OC}$ . Therefore, compliance with the batch emission limitation is assumed as long

as the permittee does not manufacture a coating that results in more emission than the "worse case" coating and the permittee monitors for OC concentrations at a

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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.

- b. Emission Limitation:  
OC emissions shall not exceed 0.12 ton per year.

## Applicable Compliance Method:

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

**F. Miscellaneous Requirements**

1. The restrictions on the potential to emit for individual hazardous air pollutants (IHAP), total combined hazardous air pollutants (TCHAP) and organic compounds (OC) established under OAC rule 3745-31-05(C) are as follows for the emissions units listed in term F.2 below:
  - a. the IHAP and TCHAP emissions shall not exceed 9.9 tons and 24.9 tons per rolling, 12-month period, respectively, and
  - b. the total OC emissions shall not exceed 99.9 tons per rolling, 12-month period.
2. The operational restriction on the potential to emit for IHAP, TCHAP and OC that establish federally enforceable limitations are as follows:
  - a. the permittee shall capture 90% of all OC emissions from solvent-based high speed dispersers in emission units identified as P013, P014, P016, P017, P021, P022, P023, P024, P025, P026, P027, P117, P118, P138, P170, P171 and P172 with venting to a regenerative thermal oxidizer (RTO) that achieves a minimum 95% destruction of O; and
  - b. the permittee shall capture 100% of all OC emissions from solvent-based thin and shade tanks in emission units identified as P047, P048, P049, P050, P051, P052, P053, P054, P055, P056, P057, P058, P059, P060, P061, P062, P063, P064, P065, P066, P067, P068, P069, P070, P071, P072, P073, P074, P075, P076, P103, P104, P105, P106, P107, P108, P109, P110, P111, P112, P113, P114, P115, P116, P120, P144, P145, P146, P147, P148, P149, P150, P154, P155, P156, P160, P161, P162, P163, P164, P165, P173, P174, P175, P176, P177, and P178 with venting to a control device that achieves a minimum 95%

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removal of OC emissions.

3. The permittee shall maintain the following monthly records, as maintained in a spreadsheet on-site, to document compliance with the restrictions to potential to emit for OC, IHAP, and TCHAP for emissions units P013, P014, P016, P017, P021, P022, P023, P024, P025, P026, P027, P117, P118, P138, P170, P171, P172, P047, P048, P049, P050, P051, P052, P053, P054, P055, P056, P057, P058, P059, P060, P061, P062, P063, P064, P065, P066, P067, P068, P069, P070, P071, P072, P073, P074, P075, P076, P103, P104, P105, P106, P107, P108, P109, P110, P111, P112, P113, P114, P115, P116, P120, P146, P147, P148, P149, P150, P160, P161, P162, P163, P164, P165, P173, P174, P175, P176, P177, and P178 are as follows:
  - a. the calculated OC emissions rate for the current month, in pounds or tons;
  - b. the rolling, 12-month summation of OC emissions (i.e., the OC emissions from the current month added to the summation of the OC emissions from the previous 11 months);
  - c. the calculated IHAP emissions rate for the current month, in pounds or tons;
  - d. the calculated TCHAP emissions rate for the current month, in pounds or tons;
  - e. the rolling 12-month summation of IHAP emissions (i.e., the IHAP emissions from the current month added to the summation of the IHAP emissions from the previous 11 months); and
  - f. the rolling 12-month summation of TCHAP emissions (i.e., the TCHAP emissions from the current month added to the summation of the TCHAP emissions from the previous 11 months).
4. The permittee shall submit quarterly deviation (excursion) reports for deviations (excursions) associated with exceedances of the following emission limitations and operational restrictions:
  - a. the rolling 12-month IHAP and TCHAP emission limitations; and
  - b. the rolling, 12-month OC emission limitation.

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

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5. Compliance with the emission limitations in Part II, section F.1 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:  
The IHAP and TCHAP emissions shall not exceed 9.9 tons and 24.9 tons per rolling, 12-month period, respectively.  
  
Applicable Compliance Method:  
Compliance shall be demonstrated by the record keeping requirements specified in section F.3 of this permit.
  - b. Emission Limitation:  
The total OC emissions shall not exceed 99.9 tons per rolling, 12- month period.  
  
Applicable Compliance Method:  
Compliance shall be demonstrated by the record keeping requirements specified in section F.3 of this permit.

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**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P178 - 4,000 gallon thin and shade tank for solvent-based coating production vented to zeolite cannister (506)	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 1.35 lbs/batch and 0.12 ton/yr. See section A.2.a below.
	OAC rule 3745-21-07(G)(2)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(C) and 3745-35-07(B).
	OAC rule 3745-31-05(C) (synthetic minor to avoid non-attainment new source review)	The emission limitation specified by this rule is equivalent or less stringent than the limit established pursuant OAC rule 3745-31-05(A)(3). See sections A.2.a, B1, B.2, F.1.b and F.2 below.
	OAC rule 3745-35-07(B) (synthetic minor to avoid TV and MACT)	See section A.2.a, A.2.b, F.1, and F.2 below.

**2. Additional Terms and Conditions**

- 2.a The 1.35 lbs OC/batch and 0.12 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

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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 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.

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- 2.b** The restrictions to potential to emit (PTE) for emission units at this facility, as maintained in a spreadsheet on-site, will ensure that the individual hazardous air pollutant (IHAP), and total combined hazardous air pollutant (TCHAP) and organic compound (OC), emissions will not exceed the Title V and MACT applicability thresholds of 10 tons IHAP and/or 25 tons TCHAP emissions and 100 tons OC per rolling, 12-month period, respectively.

Therefore, the permittee, by complying with the federally enforceable facility specific terms and conditions specified in Part II.A.2 for listed emission units will not be subject to Title V permitting and provisions in the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Miscellaneous Coating Manufacturing 40 CFR Part 63 Subpart HHHHH.

<sup>1</sup>A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the adhesive/coatings and clean up materials. This information does not have to be kept on a line-by-line basis.

**B. Operational Restrictions**

1. All OC emissions generated during pump-in and solvent blending in this emissions unit shall vented to a control device that achieves a minimum 95% removal of OC emissions.
2. The permittee shall not blend and pump to a fill line more than 15 batches of coating per month from this emission unit.

**C. Monitoring and/or Record keeping 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

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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.

#### **D. 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.

#### **E. Testing Requirements**

1. Compliance with the emission limitations in section A.1 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:  
OC emissions shall not exceed 1.35 lbs/batch.

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Applicable Compliance Method:

Compliance shall be determined by the Air Pollutant Emissions Module (APEM) based on PlantWare Batch Recipes (Sherwin-Williams, March 1999) 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" assuming 100% capture and 95% control efficiency.  $E = \frac{P(X)V(MW)}{RT}$ : Where  $P = 0.9364$  psia;  $MW = 96.66$  lb/mol;  $X = 1$  mole;  $R = 10.731$  psia ft<sup>3</sup> /lbmol R;  $V = 241$  ft<sup>3</sup>;  $T = 585$  R (125 F);  $E = \frac{0.9364 \text{ psia (1 mole) } 241 \text{ ff}^3 (96.66 \text{ lb/mol})}{10.731 \text{ psia ft}^3 / \text{lbmol R} (585 \text{ R})} = 3.47 \text{ lbs} * (1 - 0.95) = 0.17 \text{ lb OC}$ . Therefore, compliance with the batch emission limitation is assumed as long as the permittee does not manufacture a coating that results in more emission than the "worse case" coating and the permittee monitors for OC concentrations at a minimum of one time per month in accordance with the Procedure for Organic

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Vapor Monitoring (OVM) attached to the letter submitted to Ohio EPA, CDO on December 13, 2000.

- b. Emission Limitation:  
OC emissions shall not exceed 0.12 ton/yr.

Applicable Compliance Method:

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

## **F. Miscellaneous Requirements**

1. The restrictions on the potential to emit for individual hazardous air pollutants (IHAP), total combined hazardous air pollutants (TCHAP) and organic compounds (OC) established under OAC rule 3745-31-05(C) are as follows for the emissions units listed in term F.2 below:
  - a. the IHAP and TCHAP emissions shall not exceed 9.9 tons and 24.9 tons per rolling, 12-month period, respectively, and
  - b. the total OC emissions shall not exceed 99.9 tons per rolling, 12-month period.
2. The operational restriction on the potential to emit for IHAP, TCHAP and OC that establish federally enforceable limitations are as follows:
  - a. the permittee shall capture 90% of all OC emissions from solvent-based high speed dispersers in emission units identified as P013, P014, P016, P017, P021, P022, P023, P024, P025, P026, P027, P117, P118, P138, P170, P171 and P172 with venting to a regenerative thermal oxidizer (RTO) that achieves a minimum 95% destruction of O; and
  - b. the permittee shall capture 100% of all OC emissions from solvent-based thin and shade tanks in emission units identified as P047, P048, P049, P050, P051, P052, P053, P054, P055, P056, P057, P058, P059, P060, P061, P062, P063, P064, P065, P066, P067, P068, P069, P070, P071, P072, P073, P074, P075, P076, P103, P104, P105, P106, P107, P108, P109, P110, P111, P112, P113, P114, P115, P116, P120, P144, P145, P146, P147, P148, P149, P150, P154, P155, P156, P160, P161, P162, P163, P164, P165, P173, P174, P175, P176, P177, and P178 with venting to a control device that achieves a minimum 95% removal of OC emissions.
3. The permittee shall maintain the following monthly records, as maintained in a spreadsheet on-site, to document compliance with the restrictions to potential to emit for OC, IHAP, and TCHAP for emissions units P013, P014, P016, P017, P021, P022, P023, P024, P025, P026, P027, P117, P118, P138, P170, P171, P172, P047, P048,

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P049, P050, P051, P052, P053, P054, P055, P056, P057, P058, P059, P060, P061, P062, P063, P064, P065, P066, P067, P068, P069, P070, P071, P072, P073, P074, P075, P076, P103, P104, P105, P106, P107, P108, P109, P110, P111, P112, P113, P114, P115, P116, P120, P146, P147, P148, P149, P150, P160, P161, P162, P163, P164, P165, P173, P174, P175, P176, P177, and P178 are as follows:

- a. the calculated OC emissions rate for the current month, in pounds or tons;
  - b. the rolling, 12-month summation of OC emissions (i.e., the OC emissions from the current month added to the summation of the OC emissions from the previous 11 months);
  - c. the calculated IHAP emissions rate for the current month, in pounds or tons;
  - d. the calculated TCHAP emissions rate for the current month, in pounds or tons;
  - e. the rolling 12-month summation of IHAP emissions (i.e., the IHAP emissions from the current month added to the summation of the IHAP emissions from the previous 11 months); and
  - f. the rolling 12-month summation of TCHAP emissions (i.e., the TCHAP emissions from the current month added to the summation of the TCHAP emissions from the previous 11 months).
4. The permittee shall submit quarterly deviation (excursion) reports for deviations (excursions) associated with exceedances of the following emission limitations and operational restrictions:
- a. the rolling 12-month IHAP and TCHAP emission limitations; and
  - b. the rolling, 12-month OC emission limitation.

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

5. Compliance with the emission limitations in Part II, section F.1 of these terms and conditions shall be determined in accordance with the following methods:
- a. Emission Limitation:  
The IHAP and TCHAP emissions shall not exceed 9.9 tons and 24.9 tons per rolling, 12-month period, respectively.

Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping requirements specified in section F.3 of this permit.

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b. Emission Limitation:

The total OC emissions shall not exceed 99.9 tons per rolling, 12- month period.

Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping requirements specified in section F.3 of this permit.