



State of Ohio Environmental Protection Agency

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Columbus, Ohio 43215

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Columbus, OH 43216-1049

11/30/2009

DANIEL NAYDER
REPUBLIC POWDERED METALS
2628 PEARL RD
MEDINA, OH 44256

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1652050077
Permit Number: P0105698
Permit Type: Initial Installation
County: Medina

Certified Mail

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

Dear Permit Holder:

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

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

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

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install and operate will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install and Operate is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Akron Regional Air Quality Management District at (330)375-2480.

Sincerely,

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

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
ARAQMD; Canada

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

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install and Operate
REPUBLIC POWDERED METALS

Issue Date: 11/30/2009
Permit Number: P0105698
Permit Type: Initial Installation
Permit Description: Oil-Based and Latex Mix Vats
Facility ID: 1652050077
Facility Location: REPUBLIC POWDERED METALS
2628 PEARL RD,
BRUNSWICK HILLS, OH 44256
Facility Description: Paint and Coating Manufacturing

Chris Korleski, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio has issued a draft action of an air pollution control, federally enforceable permit-to-install and operate (PTIO) for the facility at the location identified above on the date indicated. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Sean Vadas at Akron Regional Air Quality Management District, 146 South High Street, Room 904 or (330)375-2480. The permit can be downloaded from the Web page: www.epa.ohio.gov/dapc



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description: Republic Powdered Metals (RPM) is an existing facility located in Medina County. The facility manufactures latex and oil based paints, roof coatings, roof adhesives, and roof primers. RPM consists of the following existing sources: oil based production and packaging units (P005 – P009), latex based production and packaging units (P011 – P015), roof coating and packaging units (P016 – P018), and TBS process (P023). This permit application covers the renewal of these existing emissions units, and also the installation of an oil based production unit (P024) and a latex based production unit (P025). RPM desired to limit facility-wide emissions of volatile organic compounds (VOC) to less than Title V threshold.

3. Facility Emissions and Attainment Status: Medina County is nonattainment for ozone. The facility emits VOC, hazardous air pollutants, and particulate, however only VOC has a potential that crosses Title V thresholds. The unrestricted potential to emit for VOC is 269 tons per year. RPM is proposing to restrict facility-wide emissions to 97 tons VOC per 12-month rolling average.

4. Source Emissions:

Emissions Unit	Unrestricted VOC PTE (tpy)	Restricted VOC PTE (tpy)
P005	25.7	7.3
P006	25.7	7.3
P007	21.1	7.3
P008	21.31	7.3
P009	21.31	7.3
P011	4.8	4.8
P012	4.4	4.4
P013	4.4	4.4
P014	4.4	4.4
P015	4.4	4.4
P016	27.9	7.3
P017	36	7.3
P018	36	7.3
P023	1.70	1.7
P024 (new)	25.7	7.3
P025 (new)	3.1	3.1
De Minimis/Exempt sources	3.95	3.95
TOTAL	271.87	97



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Permit Strategy Write-Up
Permit Number: P0105375
Facility ID: 1652050077

5. Conclusion: The terms and conditions of this permit will limit the facility's VOC emissions to less than Title V thresholds. RPM will maintain records summarizing the facility's emissions. Excursion reports will be required of the facility to ensure compliance.

6. Please provide additional notes or comments as necessary:

None

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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	97
PE	31.8



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

DRAFT

**Air Pollution Permit-to-Install and Operate
for
REPUBLIC POWDERED METALS**

Facility ID: 1652050077
Permit Number: P0105698
Permit Type: Initial Installation
Issued: 11/30/2009
Effective: To be entered upon final issuance
Expiration: To be entered upon final issuance



Air Pollution Permit-to-Install and Operate
for
REPUBLIC POWDERED METALS

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Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0105698

Facility ID: 1652050077

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 1652050077
Application Number(s): A0038630
Permit Number: P0105698
Permit Description: Oil-Based and Latex Mix Vats
Permit Type: Initial Installation
Permit Fee: \$1,000.00 *DO NOT send payment at this time - subject to change before final issuance*
Issue Date: 11/30/2009
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

REPUBLIC POWDERED METALS
2628 PEARL RD
BRUNSWICK HILLS, OH 44256

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

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

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

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and Federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0105698

Facility ID: 1652050077

Effective Date: To be entered upon final issuance

Authorization (continued)

Permit Number: P0105698
Permit Description: Oil-Based and Latex Mix Vats

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

Emissions Unit ID:	P024
Company Equipment ID:	OB#4
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P025
Company Equipment ID:	LT#1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0105698

Facility ID: 1652050077

Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions



1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is



very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.



10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Akron Regional Air Quality Management District in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0105698

Facility ID: 1652050077

Effective Date: To be entered upon final issuance

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0105698

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Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0105698

Facility ID: 1652050077

Effective Date: To be entered upon final issuance

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



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0105698

Facility ID: 1652050077

Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. P024, OB#4

Operations, Property and/or Equipment Description:

OB#4 (mixer)

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

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

a. None.

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

a. b) – g).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
b.	OAC rule 3745-17-11(B)	PE shall not exceed 1.83 pounds per hour. (based on 600 pounds/hour maximum process weight rate)
c.	OAC rule 3745-21-07(G)(2) [See b)(2)c.]	Organic compounds (OC) emissions shall not exceed 8.0 pounds per hour, and 40.0 pounds per day.
d.	OAC rule 3745-21-07(M) [See b)(2)c.]	Exempt, pursuant to OAC rule 3745-21-07(M)(3)(c)(ii) (OC potential to emit does not exceed 40 pounds per day)
e.	OAC rule 3745-31-05(D)	Organic compounds (OC) emissions from this emissions unit shall not exceed 40.0 pounds per day, and 7.3 tons per year. Combined annual emissions from this facility (emissions units P005 – P009, P011 – P018, P023 – P025) shall not



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		exceed 97.0 tons per year of volatile organic compounds (VOC), as a rolling, 12-month summation.
f.	OAC rule 3745-114-01	See d)6) – d)(9), and e)(4).
g.	OAC rule 3745-31-05(A)(3)(a)(ii)	See b)(2)d.

(2) Additional Terms and Conditions

- a. This facility has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the emissions, upon issuance of this permit.
- b. The permittee shall include all OC in the calculation of VOC emissions. The permittee has requested this condition in order to streamline the record keeping requirements.
- c. On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio’s State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The following terms and conditions shall become void after U.S. EPA approves the rule revision:

b)(1)c., d)(3)e, and d)(3)g.

The emission limitations and control requirements from the amended 21-07 rule, and the associated operational restrictions and the monitoring, record keeping, and reporting requirements contained in this permit, shall become federally enforceable on the date the U.S. EPA approves the revised OAC rule 3745-21-07 as a revision to the Ohio State Implementation Plan. The following terms shall become federally enforceable after U.S. EPA approves the rule revision:

b)(1)d.

- d. The “Best Available Technology (BAT)” requirements under OAC rule 3745-31-05(A)(3)(a) are not applicable to the particulate emissions (PE) emitted from this emissions unit [PE is emitted in the form of filterable particulate matter 10 microns or less in size (PM₁₀)]. BAT is only applicable to emissions of an air contaminant or precursor of an air contaminant for which a national ambient air quality standard (NAAQS) has been adopted under the Clean Air Act. Particulate emissions (also referred to as total suspended particulate or particulate matter) is an air contaminant that does not involve an established NAAQS.

c) Operational Restrictions

- (1) The PE from all the emissions units listed above shall be vented to the baghouse when one or more of the emissions units are in operation.



d) Monitoring and/or Recordkeeping Requirements

- (1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the baghouse is between 0.5 to 7 inches of water.
- (2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

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

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

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

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the pressure drop readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.



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

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

- (3) The permittee shall collect and record the following information for each and every day of production:
 - a. The production date and identification number of each batch produced;
 - b. The batch size, in gallons;
 - c. The batch density, in pounds per gallon;
 - d. The VOC content of each batch, in weight percent;
 - e. The daily cycle time for the emissions unit, in hours;
 - f. The daily VOC emission rate, in pounds per day, i.e., the summation of the emissions from each batch produced that day; and
 - g. The calculated average hourly VOC emission rate for the daily production of VOC per hour (average).

VOC emissions shall be calculated based upon the methodology specified in sections f)(1)c below.

- (4) For each month, the permittee shall collect and record the monthly VOC emissions for each emissions unit, in tons.
- (5) The permittee shall, on a monthly basis, calculate and record the rolling, 12-month VOC emission rates for all the emissions units at the facility, in tons.
- (6) The federally enforceable permit-to-install and operate (FEPTIO) application for this/these emissions unit(s), P024, was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level



Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled “Review of New Sources of Air Toxic Emissions, Option A”, as follows:

- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists’ (ACGIH) “Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices”; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists’ (ACGIH) “Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices”; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., “X” hours per day and “Y” days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$

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

Toxic Contaminant: Stoddard solvent

TLV (mg/m3): 525

Maximum Hourly Emission Rate (lbs/hr): 5.776

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 232.6

MAGLC (ug/m3): 12,500

The permittee, has demonstrated that emissions of Stoddard solvent and 1,2,4-trimethylbenzene, from emissions unit(s) P024, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F).



(7) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration", the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
- c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

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

- a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
- b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);
- c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
- d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination



that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

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

e) Reporting Requirements

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

- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. 97.0 tons per year VOC for entire facility, and
 - ii. 40.0 pounds per day, and 7.3 tons per year for this emissions unit.
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

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

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

(2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

(3) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the baghouse during the 12-month reporting period for this/these emissions unit(s):

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



- b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse;
 - c. each incident of deviation described in “a” (above) where a prompt investigation was not conducted;
 - d. each incident of deviation described in “a” where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - e. each incident of deviation described in “a” where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.
- (4) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the quarterly deviation (excursion) reports. If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.
- f) **Testing Requirements**
- (1) Compliance with the emission limitations in Section b)(1) of these terms and conditions shall be determined in accordance with the following methods:
 - a. **Emission Limitations:**

The visible emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Methods:

The permittee shall demonstrate compliance with the visible emission limitation above in accordance with the methods as outlined in OAC rule 3745-17-03(B)(1).
 - b. **Emission Limitations:**

1.83 lbs/hr PE

Applicable Compliance Methods:

If required, the permittee shall demonstrate compliance with the hourly emission limitation above by testing in accordance with Methods 1 – 5 of 40 CFR Part 60, Appendix A.

The annual emission limitation was developed by multiplying the hourly mass emission limitation by 8760 hours per year, and then dividing by 2000 . Therefore, compliance with the annual limitation shall be ensured if compliance with the hourly limitation is maintained.



c. Emission Limitations:

8.0 lbs/hr OC, 40.0 lbs/day, and 7.3 tons per year

Applicable Compliance Methods:

The permittee shall demonstrate compliance with the above limits based upon the record keeping requirements of sections d)(3) and d)(4).

Formulation data or USEPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the OC contents of the cleanup materials, coatings, and inks.

Daily and hourly emissions shall be calculated in accordance with the following equations:

Daily VOC Emissions = [Summation of (Size * Density * Weight Fraction * EF * (1-CF)) for all batched produced during the day]

Where:

Daily VOC Emissions = VOC emission rate for the day's production, in pounds per day;

Size = batch size, in gallons;

Density = batch density, in pounds per gallon;

Weight Fraction = VOC content of each batch, as a weight fraction;

EF = solvent loss emission factor (AP-42, Section 6.4), 0.015; and

CF = control factor (from Control of VOC Emissions from Ink and Paint Manufacturing Processes, USEPA-450/3-92-013, Section 4.2.1.1) of 0.40, based on the use of a cover for the tank.

Hourly VOC emissions = Daily VOC emissions / Time

Where:

Time = total daily production time, in hours.

d. Emission Limitations:

97.0 tons per year of VOC for the entire facility, as a rolling, 12-month summation.

Applicable Compliance Methods:

The permittee shall demonstrate compliance with the annual limitation above based upon the record keeping requirements in d)(4) and d)(5).



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0105698

Facility ID: 1652050077

Effective Date: To be entered upon final issuance

g) Miscellaneous Requirements

(1) None.



2. P025, LT#1

Operations, Property and/or Equipment Description:

LT#1 (mixer)

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - a. None.
 - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - a. b) – g).
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)	<p>Visible particulate emissions (PE) shall not exceed 5% opacity, as a 6-minute average.</p> <p>PE shall not exceed 1.95 pounds per hour, and 8.54 tons per year (based on 660 pounds per hour maximum process weight rate).</p> <p>Organic compounds (OC) shall not exceed 0.71 pound per hour, and 3.1 tons per year.</p> <p>Combined annual emissions from this facility (emissions units P005 – P009, P011 – P018, P023 – P025) shall not exceed 97.0 tons per year of volatile organic compounds (VOC), as a rolling, 12-month summation.</p>
b.	OAC rule 3745-17-07(A)	The emission limitation based on this rule is less stringent than the limit established



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		pursuant to OAC rule 3745-31-05(D).
c.	OAC rule 3745-17-11(B)	The emission limitation based on this rule is less stringent than the limit established pursuant to OAC rule 3745-31-05(D).
d.	OAC rule 3745-21-07(G)(2) [See b)(2)(c.)]	The emission limitation based on this rule is less stringent than the limit established pursuant to OAC rule 3745-31-05(D).
d.	OAC rule 3745-21-07(M) [See b)(2)(c.)]	Exempt, pursuant to OAC rule 3745-21-07(M)(3)(c)(ii) (OC potential to emit does not exceed 40 pounds per day)
e.	OAC rule 3745-31-05(D)	Combined annual emissions from this facility (P005 – P009, P011 – P018, P023 – P025) shall not exceed 97.0 tons per year of volatile organic compounds (VOC), as a rolling, 12-month summation.
f.	OAC rule 3745-114-01	See d)(6).

(2) Additional Terms and Conditions

- a. This facility has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the emissions, upon issuance of this permit.
- b. The permittee shall include all OC in the calculation of VOC emissions. The permittee has requested this condition in order to streamline the record keeping requirements.
- c. On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The following terms and conditions shall become void after U.S. EPA approves the rule revision:

b)(1)d.

The emission limitations and control requirements from the amended 21-07 rule, and the associated operational restrictions and the monitoring, record keeping, and reporting requirements contained in this permit, shall become federally enforceable on the date the U.S. EPA approves the revised OAC rule 3745-21-07 as a revision to the Ohio State Implementation Plan. The following terms shall become federally enforceable after U.S. EPA approves the rule revision:

b)(1)e.



- c) Operational Restrictions
 - (1) The emissions from the emissions units listed above shall be vented to the baghouse when one or more of the emissions units are in operation.

- d) Monitoring and/or Recordkeeping Requirements
 - (1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the baghouse is between 0.5 to 7 inches of water.
 - (2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

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

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

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

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the pressure drop readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.



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

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

- (3) The permittee shall collect and record the following information for each and every day of production:
 - a. The production date and identification number of each batch produced;
 - b. The batch size, in gallons;
 - c. The batch density, in pounds per gallon;
 - d. The VOC content of each batch, in weight percent;
 - e. The daily cycle time for the emissions unit, in hours;
 - f. The daily VOC emission rate, in pounds per day, i.e., the summation of the emissions from each batch produced that day; and
 - g. The calculated average hourly VOC emission rate for the daily production of VOC per hour (average).

VOC emissions shall be calculated based upon the methodology specified in sections f)(1)c below.

- (4) For each month, the permittee shall collect and record the monthly VOC emissions for each emissions unit, in tons.
- (5) The permittee shall, on a monthly basis, calculate and record the rolling, 12-month VOC emission rates for all the emissions units at the facility, in tons.
- (6) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified federally enforceable permit-to-install and operate (FEPTIO) prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials or use of new materials that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new FEPTIO.



e) Reporting Requirements

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

- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. 97.0 tons per year VOC for entire facility, and
 - ii. 40.0 pounds per day, and 7.3 tons per year for this emissions unit.
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. The magnitude and duration of each deviation (excursion).

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

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

(2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

(3) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the baghouse during the 12-month reporting period for this/these emissions unit(s):

- a. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the acceptable range;
- b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse;
- c. each incident of deviation described in "a" (above) where a prompt investigation was not conducted;



- d. each incident of deviation described in “a” where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
- e. each incident of deviation described in “a” where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

f) Testing Requirements

(1) Compliance with the emission limitations in Section b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations:

The visible emissions shall not exceed 5% opacity, as a 6-minute average.

Applicable Compliance Methods:

If required, the permittee shall demonstrate compliance with the VE limitation in accordance with Method 9 of 40 CFR Part 60, Appendix A.

b. Emission Limitations:

1.73 lbs/hr PE

Applicable Compliance Methods:

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 – 5 of 40 CFR Part 60, Appendix A.

The annual emission limitation was developed by multiplying the hourly mass emission limitation by 8760 hours per year, and then dividing by. Therefore, compliance with the annual limitation shall be ensured if compliance with the hourly limitation is maintained.

c. Emission Limitations:

0.71 lbs/hr OC, and 3.1 ton per year

Applicable Compliance Methods:

The permittee shall demonstrate compliance with the above limits based upon the record keeping requirements of sections d)(3) and d)(4).

Formulation data or USEPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the OC contents of the cleanup materials, coatings, and inks.

Daily and hourly emissions shall be calculated in accordance with the following equations:



Daily VOC Emissions = [Summation of (Size * Density * Weight Fraction * EF * (1-CF)) for all batched produced during the day]

Where:

Daily VOC Emissions = VOC emission rate for the day's production, in pounds per day;

Size = batch size, in gallons;

Density = batch density, in pounds per gallon;

Weight Fraction = VOC content of each batch, as a weight fraction;

EF = solvent loss emission factor (AP-42, Section 6.4), 0.015; and

CF = control factor (from Control of VOC Emissions from Ink and Paint Manufacturing Processes, USEPA-450/3-92-013, Section 4.2.1.1) of 0.40, based on the use of a cover for the tank.

Hourly VOC emissions = Daily VOC emissions / Time

Where:

Time = total daily production time, in hours.

d. Emission Limitations:

97.0 tons per year of VOC for entire facility, as a rolling, 12-month summation.

Applicable Compliance Methods:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of d)(4) and d)(5).

g) Miscellaneous Requirements

(1) None.