



State of Ohio Environmental Protection Agency

STREET ADDRESS:

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50 W. Town St., Suite 700
Columbus, Ohio 43215

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P.O. Box 1049
Columbus, OH 43216-1049

1/27/2010

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

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1652050060
Permit Number: P0105566
Permit Type: Renewal
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, 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
PLASTI-KOTE CO., INC.

Issue Date: 1/27/2010
Permit Number: P0105566
Permit Type: Renewal
Permit Description: Permit to Install and Operate (PTIO) to transition from Title V to a Federally Enforceable PTIO.
Facility ID: 1652050060
Facility Location: PLASTI-KOTE CO., INC.
1000 LAKE ROAD, P.O. BOX 708
Medina, OH 44256-3598
Facility Description: Paint and Coating Manufacturing

Chris Korleski, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio has issued a draft action of an air pollution control, 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 Laura Miracle at Akron Regional Air Quality Management District, 146 South High Street, Room 904 or (330)375-2480. The permit can be downloaded from the Web page: www.epa.ohio.gov/dapc



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description: Plasti-Kote Company Inc. manufactures various types of paints. The facility consists of two natural gas-fired boilers (B002 and B003), emergency fire water pump (B004), eight spray paint booths (K001, K002, K003, R003, R004, R005, R006, and R007), seven filling lines (P002, P003, P004, P005, P047, P048, and P049), thirty-one mixing tanks/stations/room (P007, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P022, P023, P024, P050, P051, P052, P053, P054, P055, P056, and P057), degassing booth (P021), tank washing (P025), two mill pre-mixing stations (P029 and P030), solvent recovery unit (P058), automatic drum washer for the specialty products mixing room (P059), four mills (P060, P061, P062, and P063), lid cleaning (P064), ink jet printers (P065) and forty-five storage tanks (T001, T002, T003, T004, T005, T006, T007, T008, T009, T010, T011, T012, T013, T022, T023, T024, T025, T035, T036, T037, T038, T039, T040, T041, T042, T043, T044, T045, T046, T047, T048, T049, T050, T051, T052, T053, T054, T055, T056, T057, T058, T059, T060, T062, and T063).
3. Facility Emissions and Attainment Status: The facility is currently limited to 249.4 tons of volatile organic compounds (VOC) per rolling, 12-month period, 9.5 tons of any individual hazardous air pollutant (HAP) per rolling, 12-month period, and 24.5 tons of combined HAPS per rolling, 12-month period. Medina County is nonattainment for ozone.
4. Source Emissions: The facility has requested to maintain the currently facility-wide limitations on any individual HAP and combined HAPs to avoid being considered major source for MACT applicability. The facility has further requested that the VOC emissions be limited to 99.5 tons per rolling, 12-month period to avoid Title V permitting requirements.
5. Conclusion: With the above-mentioned limitations on VOC, any individual HAP, and combined HAPs, the facility will avoid Title V and MACT applicability. The facility will maintain production records and perform calculations to demonstrate compliance with these limitations.
6. Please provide additional notes or comments as necessary:

None



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Permit Strategy Write-Up
Permit Number: P0105566
Facility ID: 1652050060

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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	99.5 tons per rolling, 12-month period for the entire facility
Any Individual HAP	9.5 tons per rolling, 12-month period for the entire facility
Combined HAPs	24.5 tons per rolling, 12-month period for the entire facility



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

DRAFT

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

Facility ID: 1652050060
Permit Number: P0105566
Permit Type: Renewal
Issued: 1/27/2010
Effective: To be entered upon final issuance
Expiration: To be entered upon final issuance



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

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State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0105566

Facility ID: 1652050060

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 1652050060

Application Number(s): A0038268

Permit Number: P0105566

Permit Description: Permit to Install and Operate (PTIO) to transition from Title V to a Federally Enforceable PTIO.

Permit Type: Renewal

Permit Fee: \$0.00 *DO NOT send payment at this time - subject to change before final issuance*

Issue Date: 1/27/2010

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:

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

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



Authorization (continued)

Permit Number: P0105566
 Permit Description: Permit to Install and Operate (PTIO) to transition from Title V to a Federally Enforceable PTIO.

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

- Emissions Unit ID: K001**
 Company Equipment ID: Spray Booth #2
 Superseded Permit Number:
 General Permit Category and Type: Not Applicable
- Emissions Unit ID: P021**
 Company Equipment ID: Degassing Booth
 Superseded Permit Number:
 General Permit Category and Type: Not Applicable
- Emissions Unit ID: P060**
 Company Equipment ID: Ball Mill
 Superseded Permit Number:
 General Permit Category and Type: Not Applicable

Group Name: Filling Lines

Emissions Unit ID:	P002
Company Equipment ID:	Filling Line #1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P003
Company Equipment ID:	Filling Line #2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P004
Company Equipment ID:	Filling Line #3
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P005
Company Equipment ID:	Filling Line #4
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Group Name: Paint Mixing Stations

Emissions Unit ID:	P022
Company Equipment ID:	Paint Mixing Station #5
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P023
Company Equipment ID:	Paint Mixing Station #6
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P024
Company Equipment ID:	Paint Mixing Station #8
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: P0105566

Facility ID: 1652050060

Effective Date: To be entered upon final issuance

Group Name: Sand Mills

Emissions Unit ID:	P061
Company Equipment ID:	Sand Mill #1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P062
Company Equipment ID:	Sand Mill #2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P063
Company Equipment ID:	Sand Mill #3
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: P0105566

Facility ID: 1652050060

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: P0105566

Facility ID: 1652050060

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: P0105566

Facility ID: 1652050060

Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



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) 1.c), 1.d)(1), 1.d)(2), 1.d)(3), 1.d)(4), 1.d)(5), 1.d)(6), 1.d)(7), 1.d)(8), and 1.d)(9).

c) Plasti-Kote Co., Inc. has requested to restrict the emissions, for the entire facility, of any individual hazardous air pollutant (HAP) to 9.5 tons per rolling, 12-month period, the emissions of total combined hazardous air pollutants (HAPs) to 24.5 tons per rolling, 12-month period, and the emissions of volatile organic compounds (VOC) to 99.5 tons per rolling, 12-month period. The permittee proposed these emission limitations to avoid being classified as a major source for Title V and to avoid being classified as a major source as defined in section 63.2 of 40 CFR Part 63 for any upcoming and promulgated Maximum Achievable Control Technology (MACT) standards (i.e., Miscellaneous Organic Chemical Production and Processes, 40 CFR Part 63, Subpart FFFF, Plastic Parts (surface coating), 40 CFR Part 63, Subpart PPPP, and Miscellaneous Coating Manufacturing, 40 CFR Part 63, Subpart HHHHH).

Plasti-Kote Co., Inc. has accepted these emission limitations as facility-wide caps on emissions from the following emissions units, combined: B002, B003, B004, K001, K002, K003, P002, P003, P004, P005, P007, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P029, P030, P047, P048, P049, P050, P051, P052, P053, P054, P055, P056, P057, P058, P059, P060, P061, P062, P063, P064, P065, R003, R004, R005, R006, R007, T001, T002, T003, T004, T005, T006, T007, T008, T009, T010, T011, T012, T013, T022, T023, T024, T025, T035, T036, T037, T038, T039, T040, T041, T042, T043, T044, T045, T046, T047, T048, T049, T050, T051, T052, T053, T054, T055, T056, T057, T058, T059, T060, T062, and T063.

d) In order to determine compliance with the facility-wide emission limitations, the permittee shall maintain monthly records of the following information for emissions units B002, B003, B004, K001, K002, K003, P002, P003, P004, P005, P007, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P029, P030, P047, P048, P049, P050, P051, P052, P053, P054, P055, P056, P057, P058, P059, P060, P061, P062, P063, P064, P065, R003, R004, R005, R006, R007, T001, T002, T003, T004, T005, T006, T007, T008, T009, T010, T011, T012, T013, T022, T023, T024, T025, T035, T036, T037, T038, T039, T040, T041, T042, T043, T044, T045, T046, T047, T048, T049, T050, T051, T052, T053, T054, T055, T056, T057, T058, T059, T060, T062, and T063:

(1) The permittee shall maintain the following monthly records for emissions units K001, K002, K003, R003, R004, R005, R006, and R007, combined,:

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



- b. the VOC content of each coating, in pounds of VOC per gallon of coating, as applied;
- c. the individual HAP* content for each HAP of each coating, in weight percent (ratio of each individual HAP to VOC), as applied;
- d. the combined HAPs content of each coating, in weight percent (ratio of combined HAPs to VOC), as applied (sum all the individual HAP contents from d)(1)c. above);
- e. the number of gallons of each coating employed;
- f. the name and identification of each cleanup material employed;
- g. the VOC content of each cleanup material, in pounds of VOC per gallon of cleanup material, as applied;
- h. the individual HAP content for each HAP of each cleanup material, in weight percent (ratio of each individual HAP to VOC), as applied;
- i. the combined HAPs content of each cleanup material, in weight percent (ratio of combined HAPs to VOC), as applied (sum all the individual HAP contents from d)(1)h. above);
- j. the number of gallons of each cleanup material employed;
- k. the total VOC from all coatings employed, in tons per month (the sum of c)(1)b. times d)(1)e. for each coating, then divide by 2000 lbs/ton);
- l. the total VOC from all cleanup materials employed, in tons per month (the sum of d)(1)g. times d)(1)j. for each cleanup material, then divide by 2000 lbs/ton);
- m. the total VOC from all coatings and cleanup materials employed, in tons per month (i.e., d)(1)k. plus d)(1)l.);
- n. the total individual HAP emissions for each HAP from all coatings employed, in tons per month (for each HAP the sum of d)(1)c. divided by 100 times d)(1)k. for each coating);
- o. the total individual HAP emissions for each HAP from all cleanup materials employed, in tons per month (for each HAP the sum of d)(1)h. divided by 100 times d)(1)l. for each cleanup material);
- p. the total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in tons per month (i.e., d)(1)n. plus d)(1)o.);
- q. the total combined HAPs emissions from all coatings employed, in tons per month (the sum of d)(1)d. divided by 100 times d)(1)k. for each coating);
- r. the total combined HAPs emissions from all cleanup materials employed, in tons per month (the sum of d)(1)i. divided by 100 times d)(1)l. for each cleanup material); and



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

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

- (2) The permittee shall maintain the following monthly records for emissions units P002, P003, P004, and P005:

- a. the total number of aerosol paint cans filled using emissions units P002, P003, and P004;
- b. the total number of aerosol paint cans filled using emissions unit P005; and
- c. the VOC emission rate from gassing, in tons per month (i.e., the sum of the product of d)(2)a. times 0.0048 pounds of VOC per can* plus the product of d)(2)b. times 0.002168 pounds of VOC per can*, divided by 2000 lbs/ton).

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

Note: The VOC , individual HAP, and combined HAPs emissions from the mixing prior to filling the cans with paint and the filling of paint into the cans for emissions unit P002, P003, P004, and P005 are determined in d)(3) below.

- (3) The permittee shall maintain the following monthly records for emissions units P007, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P022, P023, P024, P029, P030, P047, P048, P049, P050, P051, P052, P053, P054, P055, P056, P057, P060, P061, P062, P063, the mixing prior to filling the aerosol paint cans for emissions units P002, P003, P004, and P005 and the filling of paint into the cans for emissions units P002, P003, P004, and P005, combined:

- a. the total throughput of each paint category, in gallons per month;
- b. the VOC emission rate, in tons (i.e., using worst-case derived combined emission factor for each paint category as calculated using EIIP Preferred and Alternative Methods for Estimating Air Emissions Volume II, Chapter 8, Section 4, equations 8.4-1, 8.4-10, and 8.4-22);
- c. the individual HAP emission rate for each HAP, in tons (i.e., using worst-case derived combined emission factor for each paint category as calculated using EIIP Preferred and Alternative Methods for Estimating Air Emissions Volume II, Chapter 8, Section 4, equations 8.4-1, 8.4-10, and 8.4-22)); and
- d. the combined HAPs emission rate, in tons (i.e., the sum of the individual HAP emission rates from d)(3)c. above).

- (4) The permittee shall maintain the following monthly records for emissions unit P021:

- a. the number of cans degassed per month; and



- b. the VOC emission rate, in tons per month (i.e., multiply d)(4)a. times 0.192 pound of VOC per can degassed*, then divide by 2000 lbs/ton).

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

- (5) The permittee shall maintain the following monthly records for emissions unit P025:

- a. the number of tanks cleaned;
- b. the total VOC from all cleanup materials employed, in tons per month (i.e., the permittee may use the spreadsheet titled Tank Washing to determined the emissions);
- c. the total individual HAP emissions for each HAP from all cleanup materials employed, in tons per month (i.e., the permittee may use the spreadsheet titled Tank Washing to determined the emissions); and
- d. the total combined HAPs emissions from all cleanup materials employed, in tons per month (i.e., the permittee may use the spreadsheet titled Tank Washing to determined the emissions).

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

- (6) The permittee shall maintain the following monthly records for the entire facility:

- a. the total VOC emission rate for the entire facility, in tons per month (i.e., d)(1)m. plus d)(2)c. plus d)(3)b. plus d)(4)b. plus d)(5)b. plus (X*/12);
- b. the total individual HAP emission rate for each HAP for the entire facility, in tons per month (i.e., d)(1)p. plus d)(3)c. plus d)(5)c. plus (Y**/12));
- c. the total combined HAPs emission rate for all emissions units, in tons per month (i.e., d)(1)s. plus d)(3)d. plus d)(5)d. plus (Z***/12) or the summation of d)(6)b for all HAPs); and
- d. the rolling, 12-month summation of the monthly emissions of each individual HAP, total combined HAPs, and VOC for the entire facility for each calendar month.

*The annual potential to emit for VOC for the emissions units exempt under OAC rule 3745-31-03 and OAC rule 3745-15-05 "De Miminis" air contaminant source exemption.

**The annual potential to emit for each individual HAP for the emissions units exempt under OAC rule 3745-31-03 and OAC rule 3745-15-05 "De Miminis" air contaminant source exemption.



***The annual potential to emit for combined HAPs for the emissions units exempt under OAC rule 3745-31-03 and OAC rule 3745-15-05 "De Minimis" air contaminant source exemption.

- (7) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. 9.5 tons of individual HAP per rolling, 12-month period for the entire facility;
 - ii. 24.5 tons of total combined HAPs per rolling, 12-month period for the entire facility; and
 - iii. 99.5 tons of VOC per rolling, 12-month period for the entire facility.
 - 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).

- (8) 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.
- (9) Compliance with the emission limitations in 1.c) above shall be determined in accordance with the following methods:
 - a. Emission Limitations:
 - 9.5 tons of individual HAP per rolling, 12-month period



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

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

99.5 tons of VOC per rolling, 12-month period

Applicable Compliance Method:

Compliance with the annual allowable VOC, individual HAP, and combined HAPs emission limitations above shall be demonstrated based on the record keeping requirements established in 1.d)(1) through 1.d)(6) above.



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C. Emissions Unit Terms and Conditions



1. K001, Spray Booth #2

Operations, Property and/or Equipment Description:

Spray Paint Booth, HVLP Spray Gun, and Oven - Spray Booth #2

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)(1)e.

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 3745-21-07(G)	When employing, applying, evaporating, or drying any photochemically reactive material, or substance containing such photochemically reactive material, the permittee shall not discharge more than 40 pounds of organic material into the atmosphere in any one day, nor more than 8 pounds of organic material in any one hour. See b)(2)b. below.
b.	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule. See b)(2)d. below.
c.	OAC rule 3745-17-11(B)	The PE from this emissions unit shall not exceed 0.551 pound per hour.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See b)(2)c. below.
d.	OAC rule 3745-17-11(C)	See b)(2)a., c)(1), c)(2), d)(3), d)(4), d)(5), d)(6), d)(7), and e)(2) below.
e.	OAC rule 3745-31-05(D) (Synthetic Minor to avoid Title V and MACT applicability under 40 CFR Part 63, Subpart FFFF, Subpart PPPP, and Subpart HHHHH)	See 1.c) and 1.d)(1) through 1.d)(9) of Section B – Facility-Wide Terms and Conditions.

(2) Additional Terms and Conditions

- a. On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C), pertaining to control requirements for particulate emissions from surface coating processes. These control requirements and the associated operational restrictions, monitoring, record keeping, and reporting requirements contained in this permit shall become federally enforceable on the date the U.S. EPA approves paragraph (C) of OAC rule 3745-17-11 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., c)(1), c)(2), d)(3), d)(4), d)(5), d)(6), d)(7), and e)(1)c.
- b. 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)a., d)(1), d)(2), e)(1), and f)(1)a.
- c. The requirements to comply with this rule shall terminate on the date the U.S. EPA approves the requirements based on OAC rule 3745-17-11(C) as a revision to the Ohio SIP for particulate emissions.
- d. This emissions unit will be exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h) on the date when U.S. EPA approves the requirements based on OAC rule 3745-17-11(C) as a revision to the Ohio SIP for particulate emissions.

c) Operational Restrictions

- (1) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer’s recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.
- (2) The permittee shall expeditiously repair the dry particulate filter or otherwise return it to normal operations, as recommended by the manufacturer with any modifications



deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain records of the following information for this emissions unit:
 - a. the MSDS sheets for each coating and cleanup material employed;
 - b. documentation as to whether or not each coating and cleanup material is a photochemically reactive material; and
 - c. when a new coating or cleanup material is going to be employed in the coating line, the permittee shall determine and document, prior to employing the new coating or cleanup material, whether or not it is a photochemically reactive material.
- (2) For each day that any photochemically reactive material (coating or cleanup material) is employed in the coating line, the permittee shall collect and record the following information for each such day for this emissions unit:
 - a. the company identification for each coating and photochemically reactive cleanup material employed;
 - b. the number of gallons of each coating and photochemically reactive cleanup material employed;
 - c. the organic compound (OC) content of each coating and photochemically reactive cleanup material, in pounds per gallon;
 - d. for each day during which a photochemically reactive material is employed, the total OC emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day;
 - e. for each day during which a photochemically reactive material is employed, the total number of hours the emissions unit was in operation; and
 - f. for each day during which a photochemically reactive material is employed, the average hourly OC emission rate for all coatings and photochemically reactive cleanup materials, i.e., (d)/(e), in pounds per hour (average).

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

- (3) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.



- (4) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.
- (5) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (6) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
 - a. the date of the inspection;
 - b. a description of each/any problem identified and the date it was corrected;
 - c. a description of any maintenance and repairs performed; and
 - d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

- (7) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

e) Reporting Requirements

- (1) The permittee shall identify the following information in the annual permit evaluation report:
 - a. for the days during which a photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
 - b. for the days during which a photochemically reactive material was employed, an identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.



- c. any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation

- (2) Annual 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.

f) Testing Requirements

- (1) Compliance with the emission limitation(s) in b)(1) above shall be determined in accordance with the following methods:

a. Emission Limitations:

When employing, applying, evaporating, or drying any photochemically reactive material, or substance containing such photochemically reactive material, the permittee shall not discharge more than 40 pounds of organic material into the atmosphere in any one day, nor more than 8 pounds of organic material in any one hour.

Applicable Compliance Method:

Compliance with the hourly and daily allowable organic material emission limitations shall be demonstrated through the record keeping requirements established in d)(2) above.

Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and photochemically reactive cleanup materials.

b. Emission Limitation:

The PE from this emissions unit shall not exceed 0.551 pound per hour.

Applicable Compliance Method:

To determine the worst case particulate emissions rate, the following equation shall be used:

$$E = \text{maximum coating solids usage (in pounds per hour)} \times (1-TE) \times (1-CE)$$

where:

E = particulate emissions rate (pounds per hour);



TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used; and

CE = control efficiency of the control equipment.

If required, compliance shall be determined by performing emission tests in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

c. Emission Limitation:

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

Applicable Compliance Method:

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

g) Miscellaneous Requirements

- (1) None.



2. P021, Degassing Booth

Operations, Property and/or Equipment Description:

Removal of propellant gas (propane) from scrap product paint spray cans - Degassing Booth

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)(1)b.

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 3745-21-07(G)	This emissions unit is not subject to OAC rule 3745-21-07(G)(2) as determined by the Ohio Supreme Court in Ashland Chem. Co. v. Jones (2001), 92 Ohio St.3.d 234. See b)(2)a. below.
b.	OAC rule 3745-31-05(D) (Synthetic Minor to avoid Title V and MACT applicability under 40 CFR Part 63, Subpart FFFF, Subpart PPPP, and Subpart HHHHH)	See 1.c) and 1.d)(1) through 1.d)(9) of Section B – Facility-Wide Terms and Conditions.

(2) Additional Terms and Conditions

a. 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)a.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) 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.

f) Testing Requirements

(1) None.

g) Miscellaneous Requirements

(1) None.



3. P060, Ball Mill

Operations, Property and/or Equipment Description:

Equipment for grinding pigments, resins, and solvents to make paint pastes - Ball Mill

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)(1)f.

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 3745-21-07(G)	As per "The White Rubber Corporation v. Director (ERAC Case No. 675153)" decision, OAC rule 3745-21-07(G) shall not apply to an operation that is purely a mixing process with no chemical manufacturing or chemical reaction occurring. See b)(2)c. below.
b.	OAC rule 3745-17-07(A)	Visible PE from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
c.	OAC rule 3745-17-07(B)	Visible PE of fugitive dust from this emissions unit shall not exceed twenty percent opacity as a three-minute average.
d.	OAC rule 3745-17-08(B)	See b)(2)a. below.
e.	OAC rule 3745-17-11	The particulate emissions (PE) from this emissions unit shall not exceed 3.53 pounds per hour.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
f.	OAC rule 3745-31-05(D) (Synthetic Minor to avoid Title V and MACT applicability under 40 CFR Part 63, Subpart FFFF, Subpart PPPP, and Subpart HHHHH)	See 1.c) and 1.d)(1) through 1.d)(9) of Section B – Facility-Wide Terms and Conditions.

(2) Additional Terms and Conditions

- a. The installation and use of hoods, fans, and other equipment to adequately enclose, contain, capture, vent and control the fugitive dust. The collection efficiency is sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.
- b. The emissions from this emissions unit shall be vented to the baghouse at all times the emissions unit is in operation and using powder raw materials (particulate emission producing).
- 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)a.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the baghouse is between 0.1 to 5.0 inches of water.
- (2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit is in operation and using powder raw materials (particulate emission producing), 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:

- a. a description of the corrective action;
- b. the date corrective action was completed;
- c. the date and time the deviation ended;
- d. the total period of time (in minutes) during which there was a deviation;
- e. the pressure drop readings immediately after the corrective action was implemented; and
- f. 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.

- (3) 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. 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.

e) Reporting Requirements

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



- 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 was in operation and using powder raw materials (particulate emission producing) 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.
- (2) Annual 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 PER shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- f) Testing Requirements
- (1) Compliance with the emission limitation(s) in b)(1) above shall be determined in accordance with the following method(s):
 - a. Emission Limitation:

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

Applicable Compliance Method:

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

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

Applicable Compliance Method:

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



c. Emission Limitation:

The PE from this emissions unit shall not exceed 3.53 pounds per hour

Applicable Compliance Method:

Compliance with the hourly allowable PE limitation above shall be demonstrated by multiplying the PE factor of 20 pounds of PE per ton of dry pigment * by the maximum hourly amount of dry pigment (ton(s) per hour) times (1-0.9**).

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

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

**Overall control efficiency of the baghouse.

g) Miscellaneous Requirements

(1) None.



4. Emissions Unit Group - Filling Lines: P002, P003, P004, P005,

EU ID	Operations, Property and/or Equipment Description
P002	Aerosol Gassing Equipment - Kartridge Pak 9 - Head under-cap gasser/crimper - Filling Line #1
P003	Aerosol Gassing Equipment - Kartridge Pak 9 - Head under-cap gasser/crimper - Filling Line #2
P004	Aerosol Gassing Equipment - Kartridge Pak 6 - Head under-cap gasser/crimper - Filling Line #3
P005	Aerosol Gassing Equipment - Terco index filler - Filling Line #4

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)(1)b.

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 3745-21-07(G)	The emissions units listed above are not subject to OAC rule 3745-21-07(G)(2) as determined by the Ohio Supreme Court in Ashland Chem. Co. v. Jones (2001), 92 Ohio St.3.d 234. See b)(2)a. below.
b.	OAC rule 3745-31-05(D) (Synthetic Minor to avoid Title V and MACT applicability under 40 CFR Part 63, Subpart FFFF, Subpart PPPP, and Subpart HHHHH)	See 1.c) and 1.d)(1) through 1.d)(9) of Section B – Facility-Wide Terms and Conditions.



(2) Additional Terms and Conditions

a. 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)a.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) 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.

f) Testing Requirements

(1) None.

g) Miscellaneous Requirements

(1) None.



5. Emissions Unit Group - Paint Mixing Stations: P022, P023, P024,

EU ID	Operations, Property and/or Equipment Description
P022	Paint making equipment comprising of high speed disperser, 250 gal. capacity or less mixing vessel, measuring scale, and raw material metering system - Paint Mixing Station #5
P023	Paint making equipment comprising of high speed disperser, 250 gal. capacity or less mixing vessel, measuring scale, and raw material metering system - Paint Mixing Station #6
P024	Paint making equipment comprising of high speed disperser, 250 gal. capacity or less mixing vessel, measuring scale, and raw material metering system - Paint Mixing Station #8

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)(1)f.

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 3745-21-07(G)	As per "The White Rubber Corporation v. Director (ERAC Case No. 675153)" decision, OAC rule 3745-21-07(G) shall not apply to an operation that is purely a mixing process with no chemical manufacturing or chemical reaction occurring. See b)(2)c. below.
b.	OAC rule 3745-17-07(A)	For emissions unit P022, P023, and P024: Visible particulate emissions (PE) from the stack serving each emissions unit shall not exceed 20 percent opacity



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		as a six-minute average, except as provided by rule.
c.	OAC rule 3745-17-07(B)	For emissions unit P022, P023, and P024: Visible PE of fugitive dust shall not exceed twenty percent opacity as a three-minute average.
d.	OAC rule 3745-17-08(B)	See b)(2)a. below.
e.	OAC rule 3745-17-11	For emissions unit P022, P023, and P024: The PE from each emissions unit shall not exceed 3.80 pounds per hour.
f.	OAC rule 3745-31-05(D) (Synthetic Minor to avoid Title V and MACT applicability under 40 CFR Part 63, Subpart FFFF, Subpart PPPP, and Subpart HHHHH)	See 1.c) and 1.d)(1) through 1.d)(9) of Section B – Facility-Wide Terms and Conditions.

(2) Additional Terms and Conditions

- a. The installation and use of hoods, fans, and other equipment to adequately enclose, contain, capture, vent and control the fugitive dust. The collection efficiency is sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.
- b. The emissions from the emissions units listed above shall be vented to a baghouse when one or more of the emissions units are in operation and using powder raw materials (particulate emission producing).
- 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)a.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across each baghouse is between 0.1 to 5.0 inches of water.
- (2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across each baghouse when the



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

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

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

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

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

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

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



requirements of this permit and may be incorporated into this permit by means of an administrative modification.

e) Reporting Requirements

- (1) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of each 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 using powder raw materials (particulate emission producing) 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.
- (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.

f) Testing Requirements

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

For emissions unit P022, P023, and P024: Visible PE from the stack serving each emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

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



b. Emission Limitation:

For emissions unit P022, P023, and P024: Visible PE of fugitive dust shall not exceed twenty percent opacity as a three-minute average.

Applicable Compliance Method:

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

c. Emission Limitation:

For emissions unit P022, P023, and P024: The PE from each emissions unit shall not exceed 3.80 pounds per hour.

Applicable Compliance Method:

Compliance with the hourly allowable PE limitation above shall be demonstrated by multiplying the PE factor of 20 pounds of PE per ton of dry pigment * by the maximum hourly amount of dry pigment (ton(s) per hour) times (1-0.9**).

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

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

**Overall control efficiency of the baghouse.

g) Miscellaneous Requirements

(1) None.



6. Emissions Unit Group - Sand Mills: P061, P062, P063,

EU ID	Operations, Property and/or Equipment Description
P061	Equipment using sand as a grinding media to achieve proper paint paste blend - Sand Mill #1
P062	Equipment using sand as a grinding media to achieve proper paint paste blend - Sand Mill #2
P063	Equipment using sand as a grinding media to achieve proper paint paste blend - Sand Mill #3

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)(1)b.

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 3745-21-07(G)	As per "The White Rubber Corporation v. Director (ERAC Case No. 675153)" decision, OAC rule 3745-21-07(G) shall not apply to an operation that is purely a mixing process with no chemical manufacturing or chemical reaction occurring. See b)(2)a. below.
b.	OAC rule 3745-31-05(D) (Synthetic Minor to avoid Title V and MACT applicability under 40 CFR Part 63, Subpart FFFF, Subpart PPPP, and Subpart HHHH)	See 1.c) and 1.d)(1) through 1.d)(9) of Section B – Facility-Wide Terms and Conditions.



(2) Additional Terms and Conditions

a. 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)a.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) 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.

f) Testing Requirements

(1) None.

g) Miscellaneous Requirements

(1) None.