Ohio Environmental Protection Agency

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director

Certified Mail

3/11/2010

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)

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

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1652050060
Permit Number: P0105628
Permit Type: Initial Installation
County: Medina

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00, made payable to "Ohio Treasurer Kevin Boyce," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

If you have any questions, please contact Akron Regional Air Quality Management District at (330)375-2480 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPC Web page, www.epa.ohio.gov/dapc, by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

Michael W. Ahern

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

Cc: ARAQMD

Ohio | Environmental Protection Agency

FINAL

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

Facility ID: 1652050060
Permit Number: P0105628
Permit Type: Initial Installation
Issued: 3/11/2010
Effective: 3/11/2010
Expiration: 3/8/2015

Ohio Environmental Protection Agency

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

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Authorization

Facility ID: 1652050060
Application Number(s): A0038268
Permit Number: P0105628
Permit Description: Permit to Install and Operate (PTIO) to transition from Title V to a Federally Enforceable PTIO and an administrative modification to the current Permits to Install to adjust the limitations and to remove any extraneous limitations.
Permit Type: Initial Installation
Permit Fee: $10,050.00
Issue Date: 3/11/2010
Effective Date: 3/11/2010
Expiration Date: 3/8/2015
Permit Evaluation Report (PER) Annual Date: Apr 1 - Mar 31, Due May 15

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: P0105628
Permit Description: Permit to Install and Operate (PTIO) to transition from Title V to a Federally Enforceable PTIO and an administrative modification to the current Permits to Install to adjust the limitations and to remove any extraneous limitations.

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

Emissions Unit ID:	**P007**
Company Equipment ID:	Specialty Products Mixing Room
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P025**
Company Equipment ID:	Tank Washing (Combined P025 and P026)
Superseded Permit Number:	16-02430
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**R005**
Company Equipment ID:	Spray Booth #5
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**R007**
Company Equipment ID:	QC spray booth
Superseded Permit Number:	16-02334
General Permit Category and Type:	Not Applicable

Group Name: Filling Lines

Emissions Unit ID:	**P047**
Company Equipment ID:	Filling Line #5
Superseded Permit Number:	P0105244
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P048**
Company Equipment ID:	Filling Line #6
Superseded Permit Number:	P0105244
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P049**
Company Equipment ID:	Filling Line #7
Superseded Permit Number:	P0105244
General Permit Category and Type:	Not Applicable

Group Name: Large Mixing Tanks

Emissions Unit ID:	**P018**
Company Equipment ID:	L2 Large Mixing Tank
Superseded Permit Number:	P0105252
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P019**
Company Equipment ID:	L4 Large Mixing Tank
Superseded Permit Number:	P0105252
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P020**

Company Equipment ID:	L3 Large Mixing Tank
Superseded Permit Number:	P0105252
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P050**
Company Equipment ID:	L1 Large Mixing Tank
Superseded Permit Number:	P0105252
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P051**
Company Equipment ID:	L5 Large Mixing Tank
Superseded Permit Number:	P0105252
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P052**
Company Equipment ID:	L6 Large Mixing Tank
Superseded Permit Number:	P0105252
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P053**
Company Equipment ID:	L7 Large Mixing Tank
Superseded Permit Number:	P0105252
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P054**
Company Equipment ID:	L8 Large Mixing Tank
Superseded Permit Number:	P0105252
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P055**
Company Equipment ID:	L9 Large Mixing Tank
Superseded Permit Number:	P0105252
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P056**
Company Equipment ID:	L10 Large Mixing Tank
Superseded Permit Number:	P0105252
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P057**
Company Equipment ID:	L11 Large Mixing Tank
Superseded Permit Number:	P0105252
General Permit Category and Type:	Not Applicable

Group Name: Paint Mixing Stations Group 1

Emissions Unit ID:	**P011**
Company Equipment ID:	Paint Mixing Station #3
Superseded Permit Number:	16-1758
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P012**
Company Equipment ID:	Paint Mixing Station #7
Superseded Permit Number:	16-1758
General Permit Category and Type:	Not Applicable

Group Name: Paint Mixing Stations Group 2

Emissions Unit ID:	**P009**
Company Equipment ID:	Paint Mixing Station #1
Superseded Permit Number:	16-1758
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P010**
Company Equipment ID:	Paint Mixing Station #2
Superseded Permit Number:	16-1758

General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P013**
Company Equipment ID:	Paint Mixing Station #4
Superseded Permit Number:	16-1758
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P014**
Company Equipment ID:	Paint Mixing Station #9
Superseded Permit Number:	16-1758
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P015**
Company Equipment ID:	Paint Mixing Station #12
Superseded Permit Number:	16-1758
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P016**
Company Equipment ID:	Paint Mixing Station #13
Superseded Permit Number:	16-1758
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P017**
Company Equipment ID:	Paint Mixing Station #14
Superseded Permit Number:	16-1758
General Permit Category and Type:	Not Applicable

Group Name: Pre-Mix Stations

Emissions Unit ID:	**P029**
Company Equipment ID:	Mill Pre-Mixing Station #1
Superseded Permit Number:	16-02334
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P030**
Company Equipment ID:	Mill Pre-Mixing Station #2
Superseded Permit Number:	16-02334
General Permit Category and Type:	Not Applicable

Group Name: Spray Paint Booths

Emissions Unit ID:	**K002**
Company Equipment ID:	Spray Booth #3
Superseded Permit Number:	16-01940
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K003**
Company Equipment ID:	Spray Booth #4
Superseded Permit Number:	16-02317
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**R003**
Company Equipment ID:	Spray Booth #6
Superseded Permit Number:	16-01940
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**R004**
Company Equipment ID:	Spray Booth #1
Superseded Permit Number:	16-01940
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**R006**
Company Equipment ID:	Spray Booth #7
Superseded Permit Number:	16-01940
General Permit Category and Type:	Not Applicable

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. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. 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[1] 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 emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

[1] Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

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.

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.

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 Miminis" 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

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.

C. Emissions Unit Terms and Conditions

1. P007, Specialty Products Mixing Room

Operations, Property and/or Equipment Description:

Fleckstone (multi-colored texture paint) mixing and blending area

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. b)(1)h. and g)(1).

(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)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(A)(3)	The particulate emissions (PE) from this emissions unit shall not exceed 0.52 pound per hour and 2.28 tons per year. The PE 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). The organic compound (OC) emissions from this emissions unit shall not exceed 3.53 pounds per hour. See b)(2)a.
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 shall not

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		exceed twenty percent opacity as a three-minute average.
d.	OAC rule 3745-17-08(B)	See b)(2)b. below.
e.	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
f.	OAC rule 3745-21-07(G)(2)	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.
g.	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.
h.	OAC rule 3745-114-01	See g)(1) below.

(2) Additional Terms and Conditions

a. The hourly OC emission limitation and hourly and annual PE limitations regulated per OAC rule 3745-31-05(A)(3) is based on the emissions unit's potential to emit. Therefore, no record keeping or reporting is required to demonstrate compliance with these emission limitations.

However, if any proposed change(s), such as with production capacity, the types and/or quantities of materials used or processed, or anything else that increases the potential emissions of any air pollutant, then the permittee shall apply for and obtain either a modification to the federally enforceable permit-to-install and operate (FEPTIO) or a new final FEPTIO prior to the change(s).

b. 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.

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)f.

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.

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 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 0.52 pound 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.

d. Emission Limitation:

The PE from this emissions unit shall not exceed 2.28 tons per year.

Applicable Compliance Method:

The annual allowable PE limitation above was determined by multiplying the hourly allowable PE limitation by 8760 hours per year, and then dividing by 2000

pounds per ton. Therefore, as long as compliance with the hourly allowable emission limitation is maintained, compliance with the annual allowable emission limitation shall be assumed.

e. Emission Limitation:

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

Applicable Compliance Method:

Compliance with the hourly allowable OC emission limitation above shall be demonstrated by multiplying the OC emission factor of 0.0157 pound of OC per gallon of paint produced* by the maximum hourly production rate (gallons per hour).

*Emission factor is the worst-case derived emission factor as calculated using EIIP Preferred and Alternative Methods for Estimating Air Emissions Volume II, Chapter 8, Section 4, equation 8.4-1 and equation 8.4-22.

g) Miscellaneous Requirements

(1) 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 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.

2. P025, Tank Washing (Combined P025 and P026)

Operations, Property and/or Equipment Description:

Tank washing of portable tanks and totes using an automatic washer and a scrub brush to manually clean the top rim of the portable tanks and totes - Tank Washing

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. b)(1)e., d)(1), d)(2), d)(3), d)(4), and e)(1).

(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)d.

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(A)(3)	The organic compound (OC) emissions from this emissions unit shall not exceed 2.55 pounds per hour. The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 0.7 pound per hour.
b.	OAC rule 3745-21-07(G)(2)	The emission limitations specified by this rule are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3). See b)(2)b. below.
c.	OAC rule 3745-21-07(G)(9)(f)	The provisions of paragraph (G) of OAC rule 3745-21-07 shall not apply to the use of any material, in any article, machine, equipment or other contrivance described in paragraph (G)(1), (G)(2), (G)(3), or (G)(4) of OAC rule 3745-21-07, if it can

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		be demonstrated to the director's satisfaction that the emissions of organic materials into the atmosphere from such article, machine, equipment, or other contrivance are not photochemically reactive. See b)(2)b. below.
d.	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.
e.	OAC rule 3745-114-01	See d)(1), d)(2), d)(3), d)(4), and e)(1) below.

(2) Additional Terms and Conditions

a. The hourly OC and VOC emission limitations regulated per OAC rule 3745-31-05(A)(3) are based on the emissions unit's potential to emit. Therefore, no record keeping or reporting is required to demonstrate compliance with these emission limitations.

However, if any proposed change(s), such as with production capacity, the types and/or quantities of materials used or processed, or anything else that increases the potential emissions of any air pollutant, then the permittee shall apply for and obtain either a modification to the federally enforceable permit-to-install and operate (FEPTIO) or a new final FEPTIO prior to the change(s).

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)b. and b)(1)c.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permit to install application for this emissions unit, P025, was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this emissions unit 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, (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, 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: xylene

   TLV (mg/m3): 434

   Maximum Hourly Emission Rate (lbs/hr): 0.55

   Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 45.76

   MAGLC (ug/m3): 10,333

The permittee, has demonstrated that emissions of xylene, from emissions unit P025, 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).

(2) Prior to making any physical changes to or changes in the method of operation of the emissions unit, 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 or its 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.

(3) 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 or the materials applied.

(4) 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 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 annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit, or the exhaust stack have been made, then the report shall include a statement to this effect.

(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:

The OC emissions from this emissions unit shall not exceed 2.55 pounds per hour.

Applicable Compliance Method:

Compliance with the hourly allowable OC emission limitation shall be demonstrated by multiplying the derived OC emission factor* of 0.51 pound of OC per tank washed by the maximum hourly rate (5 tanks per hour).

b. Emission Limitation:

The VOC emissions from this emissions unit shall not exceed 0.7 pound per hour.

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitation shall be demonstrated by multiplying the derived VOC emission factor* of 0.14 pound of VOC per tank washed by the maximum hourly rate (5 tanks per hour).

g) Miscellaneous Requirements

(1) None.

3. R005, Spray Booth #5

Operations, Property and/or Equipment Description:

Spray Paint Booth, HVLP Spray Gun, and Oven - Spray Booth #5

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 3745-31-05(A)(3)	The organic compound (OC) emissions from this emissions unit shall not exceed 41.2 pounds per hour. The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 33.4 pounds per hour. See b)(2)c. below. A HVLP spray gun shall be employed in this emissions unit.
b.	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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		one hour. See b)(2)b. below.
c.	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.
d.	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.
e.	OAC rule 3745-17-11(B)	The PE from this emissions unit shall not exceed 0.551 pound per hour. See b)(2)e. below.
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. 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)c., 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)b., d)(1), d)(2), e)(1), and f)(1)a.

c. The hourly OC and VOC emission limitations regulated per OAC rule 3745-31-05(A)(3) are based on the emissions unit's potential to emit. Therefore, no record keeping or reporting is required to demonstrate compliance with these emission limitations.

However, if any proposed change(s), such as with production capacity, the types and/or quantities of materials used or processed, or anything else that increases the potential emissions of any air pollutant, then the permittee shall apply for and obtain either a modification to the federally enforceable permit-to-install and operate (FEPTIO) or a new final FEPTIO prior to the change(s).

d. This emissions unit will be exempt from the visible emissions (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.

e. 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.

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 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 submit annual Permit Evaluation Reports (PERs) that the following information:

a. for the days during which a photochemically reactive material was employed, an identification of each day during which the average hourly OC emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day;

b. for the days during which a photochemically reactive material was employed, an identification of each day during which the OC emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual OC emissions for each such day; and

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 OC emissions from this emissions unit shall not exceed 41.2 pounds per hour.

Applicable Compliance Method:

Compliance with the hourly allowable OC emission limitation shall be demonstrated by multiplying OC content for the “worst-case” coating in pound(s) of OC per gallon of coating by the maximum hourly amount of coating employed in gallon(s) per hour.

c. Emission Limitation:

The VOC emissions from this emissions unit shall not exceed 33.4 pounds per hour.

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitation shall be demonstrated by multiplying VOC content for the “worst-case” coating in pound(s) of VOC per gallon of coating by the maximum hourly amount of coating employed in gallon(s) per hour.

d. 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 = maximum coating solids usage (in pounds per hour) x (1-TE) x (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.

e. 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.

4. R007, QC spray booth

Operations, Property and/or Equipment Description:

Spray booth - QC Spray 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. b)(1)g. and g)(1).

(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)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(A)(3)	The organic compound (OC) emissions from this emissions unit shall not exceed 3.66 pounds per hour. The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 2.96 pounds per hour. The particulate emissions (PE) from this emissions unit shall not exceed 0.02 pound per hour and 0.1 ton per year. The visible PE from any stack shall not exceed five percent opacity, as a six-minute average. See b)(2)b. below.
b.	OAC rule 3745-17-07(A)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		rule 3745-31-05(A)(3). See b)(2)g. below.
c.	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). See b)(2)e. below.
d.	OAC rule 3745-17-11(C)(3)	Any surface coating process with a permit-to-install issued after January 1, 1990 that identifies particulate emission limitations and control measures based on best available technology, best available control technology, or the lowest achievable emission rate shall comply with such limitations and measures instead of paragraphs (C)(1) and (C)(2) of OAC rule 3745-17-11. See b)(2)f. below.
e.	OAC rule 3745-21-07(G)(2)	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)a. and b)(2)c. below.
f.	OAC rule 3745-21-09(U)(2)(e)(ii)	The permittee shall not employ more than three gallons of coating per day for the miscellaneous metal parts and products coating line. The daily usage limitation for the coating line shall not include coatings applied to parts or products which are not metal. See b)(2)d. below.
g.	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.
h.	OAC rule 3745-114-01	See g)(1) below.

(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)e., d)(2), d)(3), e)(2), and f)(1)a.

b. The hourly OC and VOC emission limitation and hourly and annual PE limitations regulated per OAC rule 3745-31-05(A)(3) are based on the emissions unit's potential to emit. Therefore, no record keeping or reporting is required to demonstrate compliance with these emission limitations.

However, if any proposed change(s), such as with production capacity, the types and/or quantities of materials used or processed, or anything else that increases the potential emissions of any air pollutant, then the permittee shall apply for and obtain either a modification to the federally enforceable permit-to-install and operate (FEPTIO) or a new final FEPTIO prior to the change(s).

c. This emissions unit becomes subject to OAC rule 3745-21-07(G)(2) for each day when any photochemically reactive material is applied to any non-metal substrate. On any such day, all emissions from both the application of photochemically reactive and non-photochemically reactive materials (coatings) on non-metal substrates is applicable to the requirement that OC emissions shall not exceed 8 pounds per hour and 40 pounds per day.

d. This emissions unit becomes subject to OAC rule 3745-21-09(U)(2)(e)(ii) when a coating is applied to a metal substrate.

e. 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.

f. 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.

g. This emissions unit will be exempt from the visible emissions (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 a double frame filter when this emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall document whether or not the double frame filter was in service when the emissions unit was in operation.

(2) 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.

(3) For each day that any photochemically reactive material (coating or cleanup material) is is applied to any non-metal substrate 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 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).]

(4) The permittee shall collect and record the following information each day for the coating line when any coating is applied to a metal substrate:

a. the name and identification number of each coating employed;

b. the volume, in gallons, of each coating employed; and

c. the total volume, in gallons, of all of the coatings employed

e) Reporting Requirements

(1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

(2) The permittee shall submit annual Permit Evaluation Reports (PERs) that include the following information:

a. for the days during which a photochemically reactive material was employed, an identification of each day during which the average hourly OC emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly OC 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 OC emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual OC emissions for each such day.

(3) 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 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 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)(3) 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 0.02 pound per hour.

Applicable Compliance Method:

Compliance with the hourly allowable PE limitation shall be demonstrated by multiplying PE content for the "worst-case" coating in pound(s) of PE per gallon of coating by the maximum hourly gallons of coating sprayed times (1-0.75*) times (1-0.9**).

*Transfer efficiency of the paint spray gun.

**The overall control efficiency for PE.

c. Emission Limitation:

The PE from this emissions unit shall not exceed 0.1 ton per year.

Applicable Compliance Method:

The annual allowable PE limitation above was determined by multiplying the hourly allowable PE limitation by 8760 hours per year, and then dividing by 2000 pounds per ton. Therefore, as long as compliance with the hourly allowable emission limitation is maintained, compliance with the annual allowable emission limitation shall be assumed.

d. Emission Limitation:

The visible PE from any stack shall not exceed five percent opacity, as a six-minute average.

Applicable Compliance Method:

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

e. Emission Limitation:

The OC emissions from this emissions unit shall not exceed 3.66 pounds per hour.

Applicable Compliance Method:

Compliance with the hourly allowable OC emission limitation shall be demonstrated by multiplying OC content for the "worst-case" coating in pound(s) of OC per gallon of coating by the maximum hourly amount of coating employed in gallon(s) per hour.

f. Emission Limitation:

The VOC emissions from this emissions unit shall not exceed 2.96 pounds per hour.

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitation shall be demonstrated by multiplying VOC content for the “worst-case” coating in pound(s) of VOC per gallon of coating by the maximum hourly amount of coating employed in gallon(s) per hour.

g) Miscellaneous Requirements

(1) 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 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.

5. Emissions Unit Group - Filling Lines: P047, P048, P049,

EU ID	Operations, Property and/or Equipment Description
P047	Inline filling of half-pint and quart containers - Filling Line #5
P048	Inline filling of 1-gallon containers - Filling Line #6
P049	Inline filling of 5-gallon containers - Filling Line #7

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. b)(1)d., d)(1), d)(2), d)(3), d)(4), and e)(1).

(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)c.

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(A)(3)	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the volatile organic compounds (VOC) emissions from these air contaminant sources since the uncontrolled potential to emit for VOC from each of these air contaminant sources is less than 10 tons per year.
b.	OAC rule 3745-21-07(G)(2)	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.
c.	OAC rule 3745-31-05(D) (Synthetic Minor to avoid Title V and MACT applicability under 40 CFR	See 1.c) and 1.d)(1) through 1.d)(9) of Section B – Facility-Wide Terms and Conditions.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	Part 63, Subpart FFFF, Subpart PPPP, and Subpart HHHHH)	
d.	OAC rule 3745-114-01	See d)(1), d)(2), d)(3), d)(4) and e)(1) below.

(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)b.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The Permit to Install (PTI) application for these emissions units, P018, P019, P020, P047, P048, P049, P050, P051, P052, P053, P054, P055, P056, and P057, was evaluated based on the actual materials and the design parameters of the emissions units' exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to these emissions units 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 units, (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 x 8/X x 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: toluene (cumene, ethyl benzene, methanol, methyl isobutyl ketone, and xylene)

TLV (mg/m3): 75

Maximum Hourly Emission Rate (lbs/hr): 32.64

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1013

MAGLC (ug/m3): 1786

Toxic Contaminant: 2-ethoxyethanol

TLV (mg/m3): 18.42

Maximum Hourly Emission Rate (lbs/hr): 1.50

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 46

MAGLC (ug/m3): 439

The permittee, has demonstrated that emissions of toluene (cumene, ethyl benzene, methanol, methyl isobutyl ketone, and xylene) and 2-ethoxyethanol, from emissions units P018, P019, P020, P047, P048, P049, P050, P051, P052, P053, P054, P055, P056, and P057, 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).

(2) 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 federally enforceable permit-to-install and operate (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.

(3) 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.

(4) 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 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 annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit, or the exhaust stack have been made, then the report shall include a statement to this effect.

(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) None.

g) Miscellaneous Requirements

(1) None.

6. Emissions Unit Group - Large Mixing Tanks: P018, P019, P020, P050, P051, P052, P053, P054, P055, P056, P057,

EU ID	Operations, Property and/or Equipment Description
P018	1100 gallon mixing tank - L2 Large Mixing Tank
P019	1100 gallon mixing tank - L4 Large Mixing Tank
P020	1900 gallon mixing tank - L3 Large Mixing Tank
P050	1900 gallon mixing tank - L1 Large Mixing Tank
P051	1500 gallon mixing tank - L5 Large Mixing Tank
P052	1500 gallon mixing tank - L6 Large Mixing Tank
P053	1500 gallon mixing tank - L7 Large Mixing Tank
P054	1500 gallon mixing tank -L8 Large Mixing Tank
P055	1500 gallon mixing tank - L9 Large Mixing Tank
P056	1500 gallon mixing tank - L10 Large Mixing Tank
P057	1500 gallon mixing tank - L11 Large Mixing Tank

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. b)(1)h., d)(4), d)(5), d)(6), d)(7), and e)(2).

(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)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(A)(3)	For emissions units P018 and P019: The volatile organic compound (VOC) emissions from each emissions unit shall not exceed 13.43 pounds per hour. For emissions units P020 and P050: The VOC emissions from each emissions unit shall not exceed 23.20 pounds per hour.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		For emissions units P051, P052, P053, P054, P055, P056, and P057: The VOC emissions from each emissions unit shall not exceed 18.31 pounds per hour. See b)(2)c. and b)(2)e. below.
b.	OAC rule 3745-17-07(A)	Visible PE from the stacks serving these emissions units 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 these emissions units shall not exceed twenty percent opacity as a three-minute average.
d.	OAC rule 3745-17-08(B)	See b)(2)b. below.
e.	OAC rule 3745-17-11	34.53 pounds of PE per hour for stack emissions from emissions units P018, P019, P020, P050, P051, P052, P053, P054, P055, P056, and P057, combined.
f.	OAC rule 3745-21-07(G)(2)	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)d. below.
g.	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. See b)(2)a. below (PE limitation to avoid Nonattainment NSR for PM 2.5 and State and Federal Modeling Requirements). The PE 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).
h	OAC rule 3745-114-01	See d)(4) through d)(7) and e)(2).

(2) Additional Terms and Conditions

a. The emissions of particulates* from emissions units P018, P019, P020, P050, P051, P052, P053, P054, P055, P056, and P057, combined, shall not exceed 9.9 tons per year, based upon a rolling, 12-month summation of the monthly emissions. To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Emissions of Particulates (Tons)
1	0.8
1-2	1.7
1-3	2.5
1-4	3.3
1-5	4.1
1-6	5.0
1-7	5.8
1-8	6.6
1-9	7.4
1-10	8.3
1-11	9.1
1-12	9.9

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual emission limitation for particulates shall be based upon a rolling, 12-month summation of the monthly emissions.

*Particulate emissions are equal to PM-10 and PM 2.5.

b. 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.

c. The hourly VOC emission limitations regulated per OAC rule 3745-31-05(A)(3) are based on each emissions unit's potential to emit. Therefore, no record

keeping or reporting is required to demonstrate compliance with these emission limitations.

However, if any proposed change(s), such as with production capacity, the types and/or quantities of materials used or processed, or anything else that increases the potential emissions of any air pollutant, then the permittee shall apply for and obtain either a modification to the federally enforceable permit-to-install and operate (FEPTIO) or a new final FEPTIO prior to the change(s)

d. 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)g.

e. 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. 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. PE (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) 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.

(3) The permittee shall collect and record the following information each month for emissions units P018, P019, P020, P050, P051, P052, P053, P054, P055, P056, and P057, combined:

a. the amount of paint produced, in pounds per month;

b. the particulate emissions, in tons per month, i.e., d)(3)a. times 0.32* divided by 2000 pounds per ton times 20 pounds per ton of ingredients in powder form** times (1-0.8991***) and then dividing by 2000 pounds per ton; and

c. beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the particulate emissions.

Also, during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative particulate emissions for each calendar month.

*This is the maximum weight percent of powder raw materials in a batch of paint.

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

***The overall control efficiency of each baghouse.

(4) The Permit to Install (PTI) application for these emissions units, P018, P019, P020, P047, P048, P049, P050, P051, P052, P053, P054, P055, P056, and P057, was evaluated based on the actual materials and the design parameters of the emissions units' exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to these emissions units 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 units, (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: toluene (cumene, ethyl benzene, methanol, methyl isobutyl ketone, and xylene)

TLV (mg/m3): 75

Maximum Hourly Emission Rate (lbs/hr): 32.64

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1013

MAGLC (ug/m3): 1786

Toxic Contaminant: 2-ethoxyethanol

TLV (mg/m3): 18.42

Maximum Hourly Emission Rate (lbs/hr): 1.50

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 46

MAGLC (ug/m3): 439

The permittee, has demonstrated that emissions of toluene (cumene, ethyl benzene, methanol, methyl isobutyl ketone, and xylene) and 2-ethoxyethanol, from emissions units P018, P019, P020, P047, P048, P049, P050, P051, P052, P053, P054, P055, P056, and P057, 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).

(5) 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 federally enforceable permit-to-install and operate (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.

(6) 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.

(7) 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 the following:

a. each period of time (start time and date, and end time and date) when the pressure drop across either 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 a 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;

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; and

f. all exceedances of the rolling, 12-month emission limitation for particulates and, for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.

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

(2) 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 annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit, or the exhaust stack have been made, then the report shall include a statement to this effect.

(3) 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) and b)(2)a. above shall be determined in accordance with the following methods:

a. Emission Limitation:

For emissions units P018 and P019: The VOC emissions from each emissions unit shall not exceed 13.43 pounds per hour.

For emissions units P020 and P050: The VOC emissions from each emissions unit shall not exceed 23.20 pounds per hour.

For emissions units P051, P052, P053, P054, P055, P056, and P057: The VOC emissions from each emissions unit shall not exceed 18.31 pounds per hour.

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitations above shall be demonstrated by multiplying the VOC emission factor of 0.012209 pound of VOC per gallon of paint produced* by the maximum hourly production rate (gallons per hour).

*Emission factor is the worst-case derived emission factor as calculated using EIIP Preferred and Alternative Methods for Estimating Air Emissions Volume II, Chapter 8, Section 4, equation 8.4-1 and equation 8.4-22.

b. Emission Limitation:

Visible PE from the stacks serving these emissions units 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.

c. Emission Limitation:

Visible PE of fugitive dust from these emissions units 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).

d. Emission Limitation:

34.53 pounds of PE per hour for stack emissions from emissions units P018, P019, P020, P050, P051, P052, P053, P054, P055, P056, and P057, combined.

Applicable Compliance Method:

If required, compliance with the hourly allowable PE limitation 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.

e. Emission Limitations:

9.9 tons of particulate emissions per year, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance with the annual allowable particulate emission limitation above shall be demonstrated based on the record keeping requirements established in d)(3) above.

g) Miscellaneous Requirements

(1) None.

7. Emissions Unit Group - Paint Mixing Stations Group 1: P011, P012,

EU ID	Operations, Property and/or Equipment Description
P011	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 #3
P012	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 #7

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. b)(1)d., d)(1), d)(2), d)(3), d)(4), and e)(1).

(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)c.

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(A)(3)	For emissions units P011 and P012: The organic compound (OC) emissions from each emissions unit shall not exceed 3.93 pounds per hour. See b)(2)a. and b)(2)b. below.
b.	OAC rule 3745-21-07(G)(2)	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.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	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.
d.	OAC rule 3745-114-01	See d)(1), d)(2), d)(3), d)(4), and e)(1) below.

(2) Additional Terms and Conditions

a. The permittee shall employ a cover to reduce solvent evaporation losses.

b. The hourly OC emission limitations regulated per OAC rule 3745-31-05(A)(3) are based on each emissions unit's potential to emit. Therefore, no record keeping or reporting is required to demonstrate compliance with these emission limitations.

However, if any proposed change(s), such as with production capacity, the types and/or quantities of materials used or processed, or anything else that increases the potential emissions of any air pollutant, then the permittee shall apply for and obtain either a modification to the federally enforceable permit-to-install and operate (FEPTIO) or a new final FEPTIO prior to the change(s)

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)b.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The Permit to Install (PTI) application for these emissions units, P009 through P017, were evaluated based on the actual materials and the design parameters of the emissions units' exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to these emissions units 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 units, (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 x 8/X x 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):

   Pollutant: toluene

   TLV (mg/m3): 75

   Maximum Hourly Emission Rate (lbs/hr): 0.81

   Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 642.4

   MAGLC (ug/m3): 1786

   Pollutant: cyclohexane

   TLV (mg/m3): 344

   Maximum Hourly Emission Rate (lbs/hr): 0.73

Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 878.1

MAGLC (ug/m3): 8192

Pollutant: methanol

TLV (mg/m3): 262

Maximum Hourly Emission Rate (lbs/hr): 0.66

Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 1083

MAGLC (ug/m3): 6238.1

Pollutant: methyl methacrylate

TLV (mg/m3): 205

Maximum Hourly Emission Rate (lbs/hr): 0.29

Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 336.8

MAGLC (ug/m3): 4881

The permittee, has demonstrated that emissions of toluene, methanol, methyl methacrylate, and cyclohexane, from emissions units P009 through P017, 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).

(2) 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.

(3) 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.

(4) 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 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 annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit, or the exhaust stack have been made, then the report shall include a statement to this effect.

(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 methods:

a. Emission Limitation:

For emissions units P011 and P012: The organic compound (OC) emissions from each emissions unit shall not exceed 3.93 pounds per hour.

Applicable Compliance Method:

Compliance with the hourly allowable OC emission limitation above shall be demonstrated by multiplying the OC emission factor of 0.0157 pound of OC per gallon of paint produced* by the maximum hourly production rate (gallons per hour).

*Emission factor is the worst-case derived emission factor as calculated using EIIP Preferred and Alternative Methods for Estimating Air Emissions Volume II, Chapter 8, Section 4, equation 8.4-1 and equation 8.4-22.

g) Miscellaneous Requirements

(1) None.

8. Emissions Unit Group - Paint Mixing Stations Group 2: P009, P010, P013, P014, P015, P016, P017,

EU ID	Operations, Property and/or Equipment Description
P009	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 #1
P010	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 #2
P013	Paint making equipment comprising of high speed disperser and 250 gal. capacity or less mixing vessel - Paint Mixing Station #4
P014	Paint making equipment comprising of high speed disperser and 250 gal. capacity or less mixing vessel - Paint Mixing Station #9
P015	Paint making equipment comprising of high speed disperser and 250 gal. capacity or less mixing vessel - Paint Mixing Station #12
P016	Paint making equipment comprising of high speed disperser and 250 gal. capacity or less mixing vessel - Paint Mixing Station #13
P017	Paint making equipment comprising of high speed disperser and 250 gal. capacity or less mixing vessel - Paint Mixing Station #14

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. b)(1)h., d)(4), d)(5), d)(6), d)(7), and e)(2).

(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)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(A)(3)	For emissions units P009, P010, P013, P014, P015, P016 and P017: The organic compound (OC) emissions from each emissions unit shall not exceed 3.93

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		pounds per hour. For emissions units P009, P010, P013, P014, P015, P016 and P017: The particulate emissions (PE) from each emissions unit shall not exceed 0.86 pound per hour and 3.77 tons per year. The PE 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). See b)(2)a. and b)(2)b. below.
b.	OAC rule 3745-17-07(A)	For emissions unit P009, P010, P013, P014, P015, P016, and P017: 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.
c.	OAC rule 3745-17-07(B)	For emissions unit P009, P010, P013, P014, P015, P016, and P017: 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)c. below.
e.	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
f.	OAC rule 3745-21-07(G)(2)	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)d. below.
g.	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.
h.	OAC rule 3745-114-01	See d)(4), d)(5), d)(6), d)(7), and e)(2)

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		below.

(2) Additional Terms and Conditions

a. The permittee shall employ a cover to reduce solvent evaporation losses.

b. The hourly OC emission limitations and hourly and annual PE limitations regulated per OAC rule 3745-31-05(A)(3) are based on each emissions unit's potential to emit. Therefore, no record keeping or reporting is required to demonstrate compliance with these emission limitations.

However, if any proposed change(s), such as with production capacity, the types and/or quantities of materials used or processed, or anything else that increases the potential emissions of any air pollutant, then the permittee shall apply for and obtain either a modification to the federally enforceable permit-to-install and operate (FEPTIO) or a new final FEPTIO prior to the change(s).

c. 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.

d. 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)f.

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(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 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(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.

(4) The Permit to Install (PTI) application for these emissions units, P009 through P017, were evaluated based on the actual materials and the design parameters of the emissions units' exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to these emissions units 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 units, (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):

Pollutant: toluene

TLV (mg/m3): 75

Maximum Hourly Emission Rate (lbs/hr): 0.81

Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 642.4

MAGLC (ug/m3): 1786

Pollutant: cyclohexane

TLV (mg/m3): 344

Maximum Hourly Emission Rate (lbs/hr): 0.73

Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 878.1

MAGLC (ug/m3): 8192

Pollutant: methanol

TLV (mg/m3): 262

Maximum Hourly Emission Rate (lbs/hr): 0.66

Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 1083

MAGLC (ug/m3): 6238.1

Pollutant: methyl methacrylate

TLV (mg/m3): 205

Maximum Hourly Emission Rate (lbs/hr): 0.29

Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 336.8

MAGLC (ug/m3): 4881

The permittee, has demonstrated that emissions of toluene, methanol, methyl methacrylate, and cyclohexane, from emissions units P009 through P017, 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).

(5) 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.

(6) 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.

(7) 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 identify in the annual permit evaluation report (PER) the following information concerning the operations of the baghouse during the 12-month reporting period for these emissions units:

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) 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 annual PER. If no changes to the emissions, emissions unit, or the exhaust stack have been made, then the report shall include a statement to this effect.

(3) 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 methods:

a. Emission Limitation:

For emissions units P009, P010, P013, P014, P015, P016 and P017: The OC emissions from each emissions unit shall not exceed 3.93 pounds per hour.

Applicable Compliance Method:

Compliance with the hourly allowable OC emission limitation above shall be demonstrated by multiplying the OC emission factor of 0.0157 pound of OC per

gallon of paint produced* by the maximum hourly production rate (gallons per hour).

*Emission factor is the worst-case derived emission factor as calculated using EIIP Preferred and Alternative Methods for Estimating Air Emissions Volume II, Chapter 8, Section 4, equation 8.4-1 and equation 8.4-22.

b. Emission Limitation:

For emissions unit P009, P010, P013, P014, P015, P016, and P017: 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.

c. Emission Limitation:

For emissions unit P009, P010, P013, P014, P015, P016, and P017: 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).

d. Emission Limitation:

For emissions units P009, P010, P013, P014, P015, P016 and P017: The PE from each emissions unit shall not exceed 0.86 pound 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.

e. Emission Limitation:

For emissions units P009, P010, P013, P014, P015, P016 and P017: The PE from each emissions unit shall not exceed 3.77 tons per year.

Applicable Compliance Method:

The annual allowable PE limitation above was determined by multiplying the hourly allowable PE limitation by 8760 hours per year, and then dividing by 2000 pounds per ton. Therefore, as long as compliance with the hourly allowable emission limitation is maintained, compliance with the annual allowable emission limitation shall be assumed.

g) Miscellaneous Requirements

(1) None.

9. Emissions Unit Group - Pre-Mix Stations: P029, P030,

EU ID	Operations, Property and/or Equipment Description
P029	Pre-mix station to mix resins, pigments, and solvents together prior to being processed through the sand mill - Mill Premixing Station #1
P030	Pre-mix station to mix resins, pigments, and solvents together prior to being processed through the sand mill - Mill Premixing Station #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. b)(1)h. and g)(1).

(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 3745-31-05(A)(3)	For emissions units P029 and P030: The organic compound (OC) emissions from each emissions unit shall not exceed 1.97 pounds per hour. For emissions units P029 and P030: The particulate emissions (PE) from each emissions unit shall not exceed 0.43 pound per hour and 1.88 tons per year. For emissions units P029 and P030: Visible PE from any stack shall not exceed ten percent opacity, as a six-minute average. The PE from the emissions units listed above shall be vented to a baghouse

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		when one or more of the emissions units are in operation and using powder raw materials (particulate emission producing).
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.
c.	OAC rule 3745-17-07(A)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
d.	OAC rule 3745-17-07(B)	For emissions units P029 and P030: Visible PE of fugitive dust shall not exceed twenty percent opacity as a three-minute average.
e.	OAC rule 3745-17-08(B)	See b)(2)b. below.
f.	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
g.	OAC rule 3745-21-07(G)(2)	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.
h.	OAC rule 3745-114-01	See g)(1) below.

(2) Additional Terms and Conditions

a. The hourly OC emission limitation and hourly and annual PE limitations regulated per OAC rule 3745-31-05(A)(3) are based on each emissions unit's potential to emit. Therefore, no record keeping or reporting is required to demonstrate compliance with these emission limitations.

However, if any proposed change(s), such as with production capacity, the types and/or quantities of materials used or processed, or anything else that increases the potential emissions of any air pollutant, then the permittee shall apply for and obtain either a modification to the federally enforceable permit-to-install and operate (FEPTIO) or a new final FEPTIO prior to the change(s).

b. 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.

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)g.

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(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 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(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 (PER) the following information concerning the operations of the baghouse during the 12-month reporting period for these emissions units:

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 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:

For emissions units P029 and P030: The OC emissions from each emissions unit shall not exceed 1.97 pounds per hour.

Applicable Compliance Method:

Compliance with the hourly allowable OC emission limitation above shall be demonstrated by multiplying the OC emission factor of 0.0157 pound of OC per gallon of paint produced* by the maximum hourly production rate (gallons per hour).

*Emission factor is the worst-case derived emission factor as calculated using EIIP Preferred and Alternative Methods for Estimating Air Emissions Volume II, Chapter 8, Section 4, equation 8.4-1 and equation 8.4-22.

b. Emission Limitation:

For emissions units P029 and P030: 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 units P029 and P030: The PE from each emissions unit shall not exceed 0.43 pound 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.

d. Emission Limitation:

For emissions units P029 and P030: The PE from each emissions unit shall not exceed 1.88 tons per year.

Applicable Compliance Method:

The annual allowable PE limitation above was determined by multiplying the hourly allowable PE limitation by 8760 hours per year, and then dividing by 2000 pounds per ton. Therefore, as long as compliance with the hourly allowable emission limitation is maintained, compliance with the annual allowable emission limitation shall be assumed.

e. Emission Limitation:

For emissions units P029 and P030: Visible PE from any stack shall not exceed ten percent opacity, as a six-minute average.

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) 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 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.

10. Emissions Unit Group - Spray Paint Booths: K002, K003, R003, R004, R006,

EU ID	Operations, Property and/or Equipment Description
K002	Spray Paint Booth, HVLP Spray Gun, and Oven - Spray Booth #3
K003	Spray Paint Booth, HVLP Spray Gun, and Oven - Spray Booth #4
R003	Spray Paint Booth and HVLP Spray Gun - Spray Booth #6
R004	Spray Paint Booth, HVLP Spray Gun, and Oven - Spray Booth #1
R006	Spray Paint Booth and HVLP Spray Gun - Spray Booth #7

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. b)(1)g., d)(4), d)(5), d)(6), d)(7), and e)(2).

(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 3745-31-05(A)(3)	For emissions units K002, K003, and R004: The organic compound (OC) emissions from each emissions unit shall not exceed 79.5 pounds per hour. For emissions units K002, K003, and R004: The volatile organic compound (VOC) emissions from each emissions unit shall not exceed 66.0 pounds per hour. For emissions units R003 and R006: The OC emissions from each emissions unit shall not exceed 68.1 pounds per hour. For emissions units R003 and R006: The

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		VOC emissions from each emissions unit shall not exceed 56.6 pounds per hour. For emissions units K002, K003, R003, R004, and R006: The particulate emissions (PE) from each emissions unit shall not exceed 0.2 pound per hour and 0.9 ton per year. For emissions units K002, K003, R003, R004, R005, and R006: The visible PE from any stack shall not exceed five percent opacity, as a six-minute average. See b)(2)b. below.
b.	OAC rule 3745-17-07(A)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). See b)(2)d.
d.	OAC rule 3745-17-11(C)(3)	Any surface coating process with a permit-to-install issued after January 1, 1990 that identifies particulate emission limitations and control measures based on best available technology, best available control technology, or the lowest achievable emission rate shall comply with such limitations and measures instead of paragraphs (C)(1) and (C)(2) of OAC rule 3745-17-11. See b)(2)c.
e.	OAC rule 3745-21-07(G)(2)	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)a. below.

	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.
g.	OAC rule 3745-114-01	See d)(4), d)(5), d)(6), d)(7), and e)(2) below.

(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)e., d)(2), d)(3), e)(1), and f)(1)a.

b. The hourly OC and VOC emission limitation and hourly and annual PE limitations regulated per OAC rule 3745-31-05(A)(3) are based on each emissions unit's potential to emit. Therefore, no record keeping or reporting is required to demonstrate compliance with these emission limitations.

However, if any proposed change(s), such as with production capacity, the types and/or quantities of materials used or processed, or anything else that increases the potential emissions of any air pollutant, then the permittee shall apply for and obtain either a modification to the federally enforceable permit-to-install and operate (FEPTIO) or a new final FEPTIO prior to the change(s).

c. 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.

d. 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.

c) Operational Restrictions

(1) The permittee shall operate a double frame filter when each emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall document whether or not the double frame filter was in service when each emissions unit was in operation.

(2) The permittee shall maintain records of the following information for these emissions units:

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.

(3) For each day that any photochemically reactive material (coating or cleanup material) is employed in one of the above listed coating line, the permittee shall collect and record the following information for each such day for the 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 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).]

(4) The permit to install application for this emissions unit, K003, was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee. The “Toxic Air Contaminant Statute”, ORC 3704.03(F), was applied to this emissions unit 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, (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: toluene (methyl isobutyl ketone, xylene, and ethyl benzene)

   TLV (mg/m3): 75

   Maximum Hourly Emission Rate (lbs/hr): 2.72

   Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 446.2

   MAGLC (ug/m3): 1786

The permittee, has demonstrated that emissions of toluene (methyl isobutyl ketone, xylene, and ethyl benzene), from emissions unit, K003, 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).

(5) 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.

(6) 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.

(7) 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 annual Permit Evaluation Reports (PERs) that include the following information:

a. for the days during which a photochemically reactive material was employed, an identification of each day during which the average hourly OC emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly OC 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 OC emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual OC emissions for each such day.

(2) 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 annual PER. 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

(3) 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 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 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)(3) 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:

For emissions units K002, K003, R003, R004, and R006: The PE from each emissions unit shall not exceed 0.2 pound per hour.

Applicable Compliance Method:

Compliance with the hourly allowable PE limitation shall be demonstrated by multiplying PE content for the “worst-case” coating in pound(s) of PE per gallon of coating by the maximum hourly amount of coating employed in gallon(s) per hour times (1-0.75*) times (1-0.9**).

*Transfer efficiency of the paint spray gun.

**The overall control efficiency for PE.

c. Emission Limitation:

For emissions units K002, K003, R003, R004, and R006: The PE from each emissions unit shall not exceed 0.9 ton per year.

Applicable Compliance Method:

The annual allowable PE limitation above was determined by multiplying the hourly allowable PE limitation by 8760 hours per year, and then dividing by 2000 pounds per ton. Therefore, as long as compliance with the hourly allowable emission limitation is maintained, compliance with the annual allowable emission limitation shall be assumed.

d. Emission Limitation:

The visible PE from any stack shall not exceed five percent opacity, as a six-minute average.

Applicable Compliance Method:

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

e. Emission Limitations:

For emissions units K002, K003, and R004: The OC emissions from each emissions unit shall not exceed 79.5 pounds per hour.

For emissions units R003 and R006: The OC emissions from each emissions unit shall not exceed 68.1 pounds per hour.

Applicable Compliance Method:

Compliance with the hourly allowable OC emission limitation shall be demonstrated by multiplying OC content for the “worst-case” coating in pound(s) of OC per gallon of coating by the maximum hourly amount of coating employed in gallon(s) per hour.

f. Emission Limitations:

For emissions units K002, K003, and R004: The VOC emissions from each emissions unit shall not exceed 66.0 pounds per hour.

For emissions units R003 and R006: The VOC emissions from each emissions unit shall not exceed 56.6 pounds per hour.

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitation shall be demonstrated by multiplying VOC content for the “worst-case” coating in pound(s) of VOC per gallon of coating by the maximum hourly amount of coating employed in gallon(s) per hour.

g) Miscellaneous Requirements

(1) None.