



Environmental
Protection Agency

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

8/20/2010

Tracy DePugh
AKZO NOBEL COATINGS, INC.
1313 WINDSOR AVE
PO BOX 489
COLUMBUS, OH 43216

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0125040064
Permit Number: P0106471
Permit Type: Initial Installation
County: Franklin

Certified Mail

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)

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, The Columbus Dispatch. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

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

and Ohio EPA DAPC, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Central District Office at (614)728-3778.

Sincerely,


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

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
Ohio EPA-CDO



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Portable small batch and intermix agitator controlled by a thermal oxidizer

3. Facility Emissions and Attainment Status:

In 2009, the facility reported 4.35 tons of VOC emissions and 0.02 tons of PM emissions.

Franklin County is currently in attainment with both the 1-hour and 8-hour ozone standards.

4. Source Emissions:

This permit is for a new install of a portable small batch agitator (P371). The uncontrolled emissions from this unit are 0.16 tpy of PM and 20.08 tpy of VOC. The VOCs will be controlled by a thermal oxidizer and will be reduced by 97.55% to a max of 0.49 tpy. The PM will be controlled by a fabric filter to a maximum allowable of 0.02 tpy.

This unit will also be included in the facility-wide synthetic minor limitation of 0.06 ton PM/yr and 5.72 tons VOC/yr. The units included in this limit are P371, P274 through P309 and P326 through P333. Testing of the thermal oxidizer will be required once the synthetic minor permit for the entire facility is renewed.

5. Conclusion:

The operation of the emissions unit in accordance with the terms and conditions of the FEPTIO will result in maximum and annual facility emissions below those levels which trigger Title V permitting requirements.

The FEPTIO includes federally enforceable limits, recordkeeping, reporting, and throughput limitations to ensure continued compliance with the FEPTIO requirements.

6. Please provide additional notes or comments as necessary:

None

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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	0.49
PM	0.02

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install and Operate
AKZO NOBEL COATINGS, INC.

Issue Date: 8/20/2010
Permit Number: P0106471
Permit Type: Initial Installation
Permit Description: Installation of a small batch portable mixer.
Facility ID: 0125040064
Facility Location: AKZO NOBEL COATINGS, INC.
1313 WINDSOR AVENUE,
Columbus, OH 43211
Facility Description: Paint and Coating Manufacturing

Chris Korleski, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio has issued a draft action of an air pollution control, federally enforceable permit-to-install and operate (PTIO) for the facility at the location identified above on the date indicated. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Bryon Marusek at Ohio EPA DAPC, Central District Office, 50 West Town Street, 6th Floor P.O. Box 1049, Columbus, OH 43216-1049 or (614)728-3778. The permit can be downloaded from the Web page: www.epa.ohio.gov/dapc

Ohio

**Environmental
Protection Agency**

DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
AKZO NOBEL COATINGS, INC.**

Facility ID: 0125040064
Permit Number: P0106471
Permit Type: Initial Installation
Issued: 8/20/2010
Effective: To be entered upon final issuance
Expiration: To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install and Operate
for
AKZO NOBEL COATINGS, INC.

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Authorization

Facility ID: 0125040064
Application Number(s): A0039699
Permit Number: P0106471
Permit Description: Installation of a small batch portable mixer.
Permit Type: Initial Installation
Permit Fee: \$200.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 8/20/2010
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

AKZO NOBEL COATINGS, INC.
1313 WINDSOR AVENUE
Columbus, OH 43211

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:

Ohio EPA DAPC, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049
(614)728-3778

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: P0106471

Permit Description: Installation of a small batch portable mixer.

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

Emissions Unit ID:	P371
Company Equipment ID:	P309
Superseded Permit Number:	
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 Ohio EPA DAPC, Central District Office 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 submitting¹ 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.

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

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).

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) None.

C. Emissions Unit Terms and Conditions



1. P371, AG-736

Operations, Property and/or Equipment Description:

Portable small batch and intermix agitator controlled by a thermal oxidizer

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)c , b)(2)o and p, e)(2)a.iii and e)(2)a.vi.

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.

Table with 3 columns: Row Label, Applicable Rules/Requirements, and Applicable Emissions Limitations/Control Measures. It contains three rows (a, b, c) detailing specific rules and emission limits for units P371, P274, P309, P326, and P333.



Table with 2 columns: Applicable Rules/Requirements, Applicable Emissions Limitations/Control Measures. Rows include OAC rule 3745-17-11 and OAC rule 3745-17-07(A)(1).

(2) Additional Terms and Conditions

- a. The hourly emissions limit is established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop monitoring, record keeping, and/or reporting requirements to ensure compliance with this limit.
b. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.
c. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.
The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the uncontrolled potential to emit for VOCs is less than 10 tpy.
d. The hourly PE limitation established for this emissions unit is greater than the potential-to-emit for PE as vented to the fabric filter and in accordance with the information provided in the PTIO application. The recordkeeping and monitoring requirements for this unit are sufficient to ensure compliance with this limit.
e. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC Rule 3745-31-05 as part of the State Implementation Plan.

The PE requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE emissions from this air contaminant source since the uncontrolled potential to emit for PE is less than 10 tpy.

- f. This facility shall utilize a Portable Tank OC Small Batch Primary Portable Fugitive Stack emission factor of 3.589 E-3 lbs. OC/gal. of product produced in the Small Batch Portable Production Area for emissions units, P274 through P309 and P326 through P333, unless otherwise approved in writing by Ohio EPA, CDO.
- g. This facility shall utilize a Primary Portable Tank OC Truck Bay Door emission factor of 1.465 E-4 lbs. OC/gal. of product produced in the Small Batch Portable Production Area for emissions units, P274 through P309 and P326 through P333, unless otherwise approved in writing by Ohio EPA, CDO.
- h. This facility shall utilize a Primary Portable Tank OC Conc/Ox emission factor of 1.73 E-2 lbs. OC/gal. of product produced in the Small Batch Portable Production Area for emissions units P274 through P309 and P326 through P333, unless otherwise approved in writing by Ohio EPA, CDO.
- i. This facility shall utilize a Intermix Tank OC Small Batch Primary Portable Fugitive Stack emission factor of 1.778 E-4 lbs. OC/gal. of product produced in the Small Batch Portable Production Area for emissions units, P274 through P309 and P326 through P333, unless otherwise approved in writing by Ohio EPA, CDO.
- j. This facility shall utilize a Intermix Portable Tank OC Truck Bay Door emission factor of 7.258 E-6 lbs. OC/gal. of product produced in the Small Batch Portable Production Area for emissions units, P274 through P309 and P326 through P333, unless otherwise approved in writing by Ohio EPA, CDO.
- k. This facility shall utilize a Intermix Portable Tank OC Conc/Ox emission factor of 3.219 E-4 lbs. OC/gal. of product produced in the Small Batch Portable Production Area for emissions units, P274 through P309 and P326 through P333, unless otherwise approved in writing by Ohio EPA, CDO.
- l. This facility shall utilize a Primary Portable Tank PM Conc/Ox emission factor of 2.2 E-5 lbs. PM/gal. of product produced in the Small Batch Portable Production Area for emissions units P274 through P309 and P326 through P333, unless otherwise approved in writing by Ohio EPA, CDO.
- m. This facility shall utilize a Primary Portable Tank PM Truck Bay Door emission factor of 5.09 E-6 lbs. PM/gal. of product produced in the Small Batch Portable Production Area for emissions units, P274 through P309 and P326 through P333, unless otherwise approved in writing by Ohio EPA, CDO.
- n. This facility shall utilize a Primary Portable Tank PM fugitive stack emission factor of 1.25 E-4 lbs. PM/gal. of product produced in the Small Batch Portable Production Area for emissions units, P274 through P309 and P326 through P333, unless otherwise approved in writing by Ohio EPA, CDO.

- (3) The facility shall maintain daily records which list the following information for products produced in the Small Batch Production Area (emissions units P371, P275 through P291, and P305 through P308):
- a. The number of gallons of product produced in the Small Batch Primary Portable Production Area;
 - b. The number of gallons of product produced in the Small Batch Intermix Portable Production Area;
 - c. The number of gallons of product produced in each emissions unit;
 - d. The total hours of daily operation of each emissions unit;
 - e. Calculations showing the daily VOC emissions, in pounds from each emissions unit to the Small Batch Fugitive Stack;
 - f. Calculations showing the daily VOC emissions, in pounds from each emissions unit to the Truck Bay Doors;
 - g. Calculations showing the daily VOC emissions, in pounds from each emissions unit to the Conc/Ox Stack;
 - h. Calculations showing the daily PM emissions, in pounds from each emissions unit to the Conc/Ox Stack;
 - i. Calculations showing the daily PM emissions, in pounds from each emissions unit to the Truck Bay Doors; and,
 - j. Calculations showing the daily PM emissions, in pounds from each emissions unit to the fugitive stacks.
- (4) The facility shall maintain monthly records which list the following information for products produced in the Small Batch Production Area (emissions units P371, P275 through P291, and P305 through P308):
- a. The total monthly VOC emissions, in pounds (sum of (3)e, f, and g above).
 - b. The total monthly PM emissions, in pounds (sum of (3)h, i, and j above).
 - c. The rolling 12-month VOC emissions, in tons is calculated by adding the current month's VOC emissions to the VOC emissions for the preceding eleven calendar months;
 - d. The rolling 12-month PM emissions, in tons is calculated by adding the current month's PM emissions to the PM emissions for the preceding eleven calendar months.

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. All deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. each period of time (start time and date, and end time and date) when the average combustion temperature within the thermal oxidizer was below 1350 degrees Fahrenheit;
 - ii. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the thermal oxidizer;
 - iii. any deviations from the rolling 12-month coating production limitation for both the Small Batch Primary Portable Production Area and the Small Batch Intermix Portable Production Area;
 - iv. any deviations from the hourly or annual VOC limit for emissions unit P371;
 - v. any deviations from the hourly or annual PM limit for emissions unit P371;
 - vi. any deviations from the rolling 12-month PM limit or rolling 12-month VOC limit for emissions units P371, P275 through P291, and P305 through P308
 - 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).

[OAC rule 3745-15-03(B)(1)(b)] and [OAC rule 3745-15-03(C)]

- (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 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 limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:
- a. Emission Limitation
- VOC emissions from emissions unit P371 shall not exceed 0.11 lb/hr and 0.49 tpy
- Applicable Compliance Method
- Compliance with the short term limitation of 0.11 lbs/hr shall be demonstrated by multiplying the uncontrolled VOC emission factor of 0.22 lbs/VOC/gallon produced by the total throughput of resin divided by 8,760 hours per year multiplied by the 97.55% control efficiency of the thermal oxidizer.
- Compliance with the annual VOC limitation of 0.49 tpy shall be demonstrated by multiplying the actual controlled short term VOC emissions rate in lb/hr by 8,760 hours of operation and dividing by 2,000 pounds per ton.
- b. Emissions Limitation
- VOC emissions from emissions units P371, P275 through P291, and P305 through P308 shall not exceed 5.72 tpy as a rolling, 12-month summation.
- Applicable Compliance Method
- Compliance with the rolling 12-month VOC limit for emissions units P371, P275 through P291, and P305 through P308 shall be demonstrated by maintaining the records required in d)(4) above.
- c. Emission Limitation
- Particulate emissions from emissions unit P371 shall not exceed 0.005 lb/hr and 0.02 ton/yr.
- Applicable Compliance Method
- Compliance with the short term limitation of 0.005 lbs/hr shall be demonstrated by multiplying the uncontrolled particulate emission factor of 0.0017262 lbs-PM/gallon produced by the total throughput of product in emissions unit P371 divided by 8,760 hours per year multiplied by the 87.5% control efficiency of the fabric filter.

Compliance with the annual particulate emission limitation of 0.02 tpy shall be demonstrated by multiplying the actual controlled short term particulate emissions rate in lb/hr by 8,760 hours of operation and dividing by 2,000 pounds per ton.

d. Emission Limitation

Particulate emissions from emissions units P371, P275 through P291, and P305 through P308 shall not exceed 0.06 tpy as a rolling, 12-month summation.

Applicable Compliance Method

Compliance with the rolling 12-month particulate emissions limit for emissions units P371, P275 through P291, and P305 through P308 shall be demonstrated by maintaining the records required in d)(4) above.

e. Emission Limitation

Visible particulate emissions from emissions unit P371 shall not exceed 20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method(s)

Compliance with the visible emission limitation identified above shall be determined in accordance with Test Method 9 set forth in Appendix on Test methods in 40 CFR, Part 60 (Standards of Performance for New Stationary Sources) as such appendix existed on July 1, 1997.

(2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- a. The emission testing shall be conducted within 90 days of the issuance of the FEPTIO renewal for the entire facility. The testing shall include the following emissions units that are controlled by the thermal incinerator:

P371, P275 through P291, and P305 through P308

- b. The emission testing shall be conducted to demonstrate compliance with the 97.55% destruction requirement for the thermal incinerator.
- c. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.
- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office



or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

- f. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

g) **Miscellaneous Requirements**

- (1) None.