



Environmental
Protection Agency

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

10/18/2010

Mr. Thomas Bauer
The Garland Company, Inc.
3800 E. 91st St.
Cleveland, OH 44105

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 1318007412
Permit Number: P0104934
Permit Type: Renewal
County: Cuyahoga

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
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 Plain Dealer. 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 Cleveland Division of Air Quality
2nd Floor
75 Erieview Plaza
Cleveland, OH 44114

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 Cleveland Division of Air Quality at (216)664-2297.

Sincerely,

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

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



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Materials for roof sealants and coatings are combined in 11 tanks, blended and then pumped to close storage containers.

P003 – 370 gallon mixing tank, vented to torit dust collector
P004 – 500 gallon mixing tank, vented to torit dust collector
P005 – 500 gallon mixing tank, vented to torit dust collector
P006 – 2000 gallon mixing tank, vented to torit dust collector
P007 – 563 gallon mixing tank, vented to torit dust collector
P008 – 519 gallon mixing tank, vented to torit dust collector
P009 – 286 gallon mixing tank, vented to torit dust collector
P010 – 229 gallon mixing tank, vented to torit dust collector
P011 – 260 gallon mixing tank, vented to torit dust collector
P012 – 150 gallon mixing tank
P013 – 102 gallon mixing tank

The process equipment (P003-P012) was installed in 1940. The baghouse associated with P003-P011 was installed in 1984. P013 was installed in 1991.

3. Facility Emissions and Attainment Status:

The potential to emit VOC, for P003-P013, operating 8760 hours per year exceeds the Title V major source threshold of 100 tons/yr.

The proposed allowable for P003-P013 combined is 43.65 TPY as a 12-month rolling limit.

Cuyahoga County was re-designated in attainment (9/15/2009) for ozone, and non-attainment for PM_{2.5}.

4. Source Emissions:

The potential to emit for VOC for emissions units P003-P013 is 411.72 TPY. The facility has accepted an annual emissions limitation of 43.65 TPY of VOC and a production limit of 1,000,000 gal/yr which is equivalent to 9,000,000 lbs/yr (density ~ 9 lbs/gal). The facility has requested a federally enforceable operating restriction on the annual production limit. The facility will restrict coatings production to 9,000,000 pounds per rolling, 12-month period. No lb/hr limits were established for P003-P012 because they were installed in 1940. A BAT lb/hr limit was established for P013 because it was installed in 1991. The PTE for single and combined HAPs does not exceed major source thresholds.



5. Conclusion:

The potential to emit VOC for the facility will be restricted below the Title V threshold with the federally enforceable annual production restriction of 9,000,000 pounds per rolling, 12-month period for the facility coupled with the federally enforceable annual emission limitation of 43.65 tpy per rolling, 12-month period. Provided the facility maintains compliance with the terms and conditions for P003-P013, this facility will not be subject to Title V permitting. Monthly record keeping of VOC and production is required.

6. Please provide additional notes or comments as necessary:

The emissions units were originally combined into "P001" and put on registration status.

OAC rule 3745-21-07 (old v. amended)

The Ohio Supreme Court's decision in Ashland Chemical Company v. Jones, 92 Ohio St. 3d 234, 2001-Ohio-184, ruled that the old OAC rule 3745-21-07(G) could not be applied to container filling operations (and by logical extension, to mixing operations), in which there is no chemical reaction occurring, because the operations are not "employing" any liquid organic materials.

The requirements of OAC rule 3745-21-07(M) do not apply to the emissions unit because the VOC emissions are uncontrolled and the process does not involve any baking or heat curing.

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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	43.65
PE (stack)	21.72
PM (fugitive)	1.45

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install and Operate
The Garland Company, Inc.

Issue Date: 10/18/2010

Permit Number: P0104934

Permit Type: Renewal

Permit Description: FEPTIO for an emissions unit originally put on registration status. This is a renewal for 11 mixing tanks in the coatings operation of the facility. Particulate emissions from P003-P011 are controlled by a torit dust collector.

Facility ID: 1318007412

Facility Location: The Garland Company, Inc.
3800 EAST 91ST STREET,
Cleveland, OH 44105

Facility Description: Asphalt Shingle and Coating Materials 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 David Hearne at Cleveland Division of Air Quality, 2nd Floor 75 Erieview Plaza, Cleveland, OH 44114 or (216)664-2297. The permit can be downloaded from the Web page: www.epa.ohio.gov/dapc



DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
The Garland Company, Inc.**

Facility ID: 1318007412
Permit Number: P0104934
Permit Type: Renewal
Issued: 10/18/2010
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
The Garland Company, Inc.

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Authorization

Facility ID: 1318007412

Application Number(s): A0037553, A0038740

Permit Number: P0104934

Permit Description: FEPTIO for an emissions unit originally put on registration status. This is a renewal for 11 mixing tanks in the coatings operation of the facility. Particulate emissions from P003-P011 are controlled by a torit dust collector.

Permit Type: Renewal

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

Issue Date: 10/18/2010

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:

The Garland Company, Inc.
3800 EAST 91ST STREET
Cleveland, OH 44105

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:

Cleveland Division of Air Quality
2nd Floor
75 Erieview Plaza
Cleveland, OH 44114
(216)664-2297

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: P0104934
Permit Description: FEPTIO for an emissions unit originally put on registration status. This is a renewal for 11 mixing tanks in the coatings operation of the facility. Particulate emissions from P003-P011 are controlled by a torit dust collector.

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

Emissions Unit ID: P012
Company Equipment ID: Mixer 10 - Coatings Department
Superseded Permit Number: P0056560
General Permit Category and Type: Not Applicable

Group Name: Coatings Operation

Emissions Unit ID:	P003
Company Equipment ID:	Mixer 1 - Coatings Department
Superseded Permit Number:	P0056560
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P004
Company Equipment ID:	Mixer 2 - Coatings Department
Superseded Permit Number:	P0056560
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P005
Company Equipment ID:	Mixer 3 - Coatings Department
Superseded Permit Number:	P0056560
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P006
Company Equipment ID:	Mixer 4 - Coatings Department
Superseded Permit Number:	P0056560
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P007
Company Equipment ID:	Mixer 5 - Coatings Department
Superseded Permit Number:	P0056560
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P008
Company Equipment ID:	Mixer 6 - Coatings Department
Superseded Permit Number:	P0056560
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P009
Company Equipment ID:	Mixer 7 - Coatings Department
Superseded Permit Number:	P0056560
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P010
Company Equipment ID:	Mixer 8 - Coatings Department
Superseded Permit Number:	P0056560
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P011
Company Equipment ID:	Mixer 9 - Coatings Department
Superseded Permit Number:	P0056560
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 Cleveland Division of Air Quality 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

Draft Permit-to-Install and Operate

The Garland Company, Inc.

Permit Number: P0104934

Facility ID: 1318007412

Effective Date: To be entered upon final issuance

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

C. Emissions Unit Terms and Conditions

1. P012, Mixer 10 - Coatings Department

Operations, Property and/or Equipment Description:

Mixer 10 - 150-gal mixing tank for the production of roof sealants and coatings.

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)(2)d.

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

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(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 are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D) (Synthetic Minor to avoid Title V)	Volatile organic compound (VOC) emissions for P003-P013 shall not exceed 43.65 tons per year (tpy) based on a rolling, 12-month summation. See b)(2)a. and b.
b.	OAC rule 3745-17-07(B)	Visible particulate emissions from fugitive dust shall not exceed 20 percent opacity as a three-minute average.
c.	OAC rule 3745-17-08(B)	Reasonably available control measures (RACM) must be employed to sufficiently minimize or eliminate visible emissions of fugitive dust.

(2) Additional Terms and Conditions

a. The emissions of VOC from the emissions units P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, and P013 shall not exceed 43.65 tons per year, based upon a rolling, 12-month summation of the VOC emissions. To ensure

Draft Permit-to-Install and Operate

The Garland Company, Inc.

Permit Number: P0104934

Facility ID: 1318007412

Effective Date: To be entered upon final issuance

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:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Emissions of VOC (Tons)</u>
1	3.64
1-2	7.28
1-3	10.92
1-4	14.56
1-5	18.20
1-6	21.84
1-7	25.48
1-8	29.12
1-9	32.76
1-10	36.40
1-11	40.03
1-12	43.65

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 VOC shall be based upon a rolling, 12-month summation of the monthly emissions.

- b. The maximum annual coating production level for emissions units P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, and P013 shall not exceed 9,000,000 pounds per year, based upon a rolling, 12-month summation of the coating production figures.

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 production levels specified in the following table:

<u>Month(s)</u>	<u>Cumulative Production (pounds)</u>
1	750,000
1-2	1,500,000

Draft Permit-to-Install and Operate

The Garland Company, Inc.

Permit Number: P0104934

Facility ID: 1318007412

Effective Date: To be entered upon final issuance

1-3	2,250,000
1-4	3,000,000
1-5	3,750,000
1-6	4,500,000
1-7	5,250,000
1-8	6,000,000
1-9	6,750,000
1-10	7,500,000
1-11	8,250,000
1-12	9,000,000

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual coating production level limitation shall be based upon a rolling, 12-month summation of the coating production figures.

- c. The Ohio Supreme Court's decision in Ashland Chemical Company v. Jones, 92 Ohio St. 3d 234, 2001-Ohio-184, ruled that the old OAC rule 3745-21-07(G) could not be applied to container filling operations (and by logical extension, to mixing operations), in which there is no chemical reaction occurring, because the operations are not "employing" any liquid organic materials.
- d. The requirements of OAC rule 3745-21-07(M) do not apply to the emissions unit because the VOC emissions are uncontrolled and the process does not involve any baking or heat curing.
- e. 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)(2)c.]

The emission limitations and control requirements from the amended 21-07 rule, and the associated operational restrictions and the monitoring, record keeping, and reporting requirements contained in this permit, shall become federally enforceable on the date the U.S. EPA approves the revised OAC rule 3745-21-

Draft Permit-to-Install and Operate

The Garland Company, Inc.

Permit Number: P0104934

Facility ID: 1318007412

Effective Date: To be entered upon final issuance

07 as a revision to the Ohio State Implementation Plan. The following terms shall become federally enforceable after U.S. EPA approves the rule revision:

[b)(2)d.]

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for the emissions units P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, and P013:

- a. the name and identification of each batch of coating produced;
- b. the amount of each coating produced, in pounds;
- c. the rolling, 12-month summation of the coating production figures, in pounds;
- d. the VOC emissions from each coating produced, in pounds or tons, calculated by multiplying the pounds of coating produced by an emissions factor of 0.97% (Garland Lab Mass Balance Study, 01/09); or by an emissions factor established by the most recent stack test;
- e. the updated rolling, 12-month summation of the total combined VOC emissions from all coating produced, in pounds (This shall include the information for the current month and the preceding eleven months); and
- f. the rolling, 12-month summation of the VOC emissions, in tons.

(2) The permittee shall maintain monthly records of the following information for the emissions units P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, and P013:

- a. the VOC emission rate for each month of operations; and
- b. 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 VOC 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 VOC emissions for each calendar month.

(3) The permittee shall maintain monthly records of the following information for the emissions units P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, and P013:

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- a. the coating production figure for each month; and
- b. 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 coating production figures.

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 coating production figure for each calendar month.

- (4) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the location and color of the emissions;
- b. whether the emissions are representative of normal operations;
- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any visible emission incident; and
- e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

The permittee may, upon receipt of written approval from the Cleveland Division of Air Quality (CDAQ), modify the above-mentioned frequencies for performing the visible emissions checks if operating experience indicates that less frequent visible emissions checks would be sufficient to ensure compliance with the above-mentioned applicable requirements.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports for P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, and P013 that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the

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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. all exceedances of the rolling, 12-month emission limitation for VOC 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; and
 - ii. all exceedances of the rolling, 12-month coating production level limitation; 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 coating production levels.
- 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 CDAQ.

- (2) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(4) above:
 - a. all days during which any visible fugitive particulate emissions were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and
 - b. any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions.
- (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 emissions limitation(s) in Section b) of these terms and conditions shall be determined in accordance with the following method(s):

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a. Emission Limitation:

VOC emissions, for emissions units P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, and P013, shall not exceed 43.65 tons/rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be determined by the record keeping and reporting specified in Sections d) and e).

b. Emission Limitation:

Maximum annual production, for emissions units P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, and P013, shall not exceed 9,000,000 pounds per year, based upon a rolling, 12-month summation of the coating production figures.

Applicable Compliance Method:

Compliance shall be determined by the record keeping and reporting specified in Sections d) and e).

c. Emission Limitation:

Visible emissions of fugitive dust shall not exceed 20 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).

g) Miscellaneous Requirements

- (1) The emissions unit was installed in 1940.

2. Emissions Unit Group - Coatings Operation: P003, P004, P005, P006, P007, P008, P009, P010, P011,

EU ID	Operations, Property and/or Equipment Description
P003	Mixer 1 - 370-gal mixing tank for the production of roof sealants and coatings.
P004	Mixer 2 - 500-gal mixing tank for the production of roof sealants and coatings.
P005	Mixer 3 - 500-gal mixing tank for the production of roof sealants and coatings.
P006	Mixer 4 - 2,000-gal mixing tank for the production of roof sealants and coatings.
P007	Mixer 5 - 563-gal mixing tank for the production of roof sealants and coatings.
P008	Mixer 6 - 519-gal mixing tank for the production of roof sealants and coatings.
P009	Mixer 7 - 286-gal mixing tank for the production of roof sealants and coatings.
P010	Mixer 8 - 229-gal mixing tank for the production of roof sealants and coatings.
P011	Mixer 9 - 260-gal mixing tank for the production of roof sealants and coatings.

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)(2)e.

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

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(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 are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D) (Synthetic Minor to avoid Title V)	Volatile organic compound (VOC) emissions for P003-P013 shall not exceed 43.65 tons per year (tpy) based on a rolling, 12-month summation. See b)(2)a., and b.
b.	OAC rule 3745-17-07(A)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by

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Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	rule.
OAC rule 3745-17-07(B)	Visible particulate emissions of fugitive dust from this emissions unit shall not exceed 20 percent opacity as a three-minute average.
OAC rule 3745-17-08(B)(3)	Reasonably available control measures (RACM) must be employed to sufficiently minimize or eliminate visible emissions of fugitive dust. See b)(2)c.
OAC rule 3745-17-11(B)(1)	Particulate emissions (PE) shall not exceed 0.551 pound per hour (lb/hr).

(2) Additional Terms and Conditions

- a. The emissions of VOC from the emissions units P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, and P013 shall not exceed 43.65 tons per year, based upon a rolling, 12-month summation of the VOC 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:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Emissions of VOC (Tons)</u>
1	3.64
1-2	7.28
1-3	10.92
1-4	14.56
1-5	18.20
1-6	21.84
1-7	25.48
1-8	29.12
1-9	32.76
1-10	36.40
1-11	40.03

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43.65

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 VOC shall be based upon a rolling, 12-month summation of the monthly emissions.

- b. The maximum annual coating production level for emissions units P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, and P013 shall not exceed 9,000,000 pounds per year, based upon a rolling, 12-month summation of the coating production figures.

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 production levels specified in the following table:

<u>Month(s)</u>	<u>Cumulative Production</u> <u>(pounds)</u>
1	750,000
1-2	1,500,000
1-3	2,250,000
1-4	3,000,000
1-5	3,750,000
1-6	4,500,000
1-7	5,250,000
1-8	6,000,000
1-9	6,750,000
1-10	7,500,000
1-11	8,250,000
1-12	9,000,000

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual coating production level limitation shall be based upon a rolling, 12-month summation of the coating production figures.

- c. The installation and use of hoods, fans, and/or other equipment to adequately enclose, contain, capture, vent, and control fugitive dust from this emissions unit shall meet the following requirements:

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- i. the collection efficiency shall be 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.
 - ii. the control equipment for this emissions unit shall achieve an outlet emission rate of not greater than 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases or there shall be no visible particulate emissions (whichever is less stringent) from the exhaust stack of this emissions unit.
- d. The Ohio Supreme Court's decision in Ashland Chemical Company v. Jones, 92 Ohio St. 3d 234, 2001-Ohio-184, ruled that the old OAC rule 3745-21-07(G) could not be applied to container filling operations (and by logical extension, to mixing operations), in which there is no chemical reaction occurring, because the operations are not "employing" any liquid organic materials.
- e. The requirements of OAC rule 3745-21-07(M) do not apply to the emissions unit because the VOC emissions are uncontrolled and the process does not involve any baking or heat curing.
- f. 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)(2)d.]

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

[b)(2)e.]

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for emissions units P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, and P013:
 - a. the name and identification of each batch of coating produced;

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- b. the amount of each coating produced, in pounds;
 - c. the rolling, 12-month summation of the coating production figures, in pounds;
 - d. the VOC emissions from each coating produced, in pounds or tons, calculated by multiplying the pounds of coating produced by an emissions factor of 0.97% (Garland Lab Mass Balance Study, 01/09); or by an emissions factor established by the most recent stack test;
 - e. the updated rolling, 12-month summation of the total combined VOC emissions from all coatings produced, in pounds (This shall include the information for the current month and the preceding eleven months); and
 - f. the rolling, 12-month summation of the VOC emissions, in tons.
- (2) The permittee shall maintain monthly records of the following information for the emissions units P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, and P013:
- a. the VOC emission rate for each month of operations; and
 - b. 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 VOC 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 VOC emissions for each calendar month.

- (3) The permittee shall maintain monthly records of the following information for the emissions units P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, and P013:
- a. the coating production figure for each month; and
 - b. 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 coating production figures.

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 coating production figure for each calendar month.

- (4) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack and for any visible fugitive particulate emissions from the egress points (i.e., building windows, doors, roof monitors, etc.) serving these emissions units. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

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- a. the location and color of the emissions;
- b. whether the emissions are representative of normal operations;
- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any visible emission incident; and
- e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

The permittee may, upon receipt of written approval from the Cleveland Division of Air Quality (CDAQ), modify the above-mentioned frequencies for performing the visible emissions checks if operating experience indicates that less frequent visible emissions checks would be sufficient to ensure compliance with the above-mentioned applicable requirements.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports for P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, and P013 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. all exceedances of the rolling, 12-month emission limitation for VOC 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; and
 - ii. all exceedances of the rolling, 12-month coatings production level limitation; 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 coatings production levels.
 - 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

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- 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 CDAQ.

- (2) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(4) above:

- a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit;
- b. all days during which any visible fugitive particulate emissions were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and
- c. any corrective actions taken to minimize or eliminate the visible particulate emissions and/or visible fugitive particulate emissions.

- (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 emissions limitation(s) in Section b) of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation:
VOC emissions, for emissions units P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, and P013, shall not exceed 43.65 tons/rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be determined by the record keeping and reporting specified in Sections d) and e).

The permittee shall conduct emissions testing in accordance with f)(2) to determine an emissions factor for calculating VOC emissions.

- b. Emission Limitation:
Maximum annual production, for emissions units P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, and P013, shall not exceed 9,000,000 pounds

per year, based upon a rolling, 12-month summation of the coating production figures.

Applicable Compliance Method:

Compliance shall be determined by the record keeping and reporting specified in Sections d) and e).

c. Emission Limitation

Visible particulate emissions from any/the stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule; and visible particulate emissions from fugitive dust shall not exceed 20 percent opacity as a three-minute average.

Applicable Compliance Method

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

d. Emission Limitation:

The controlled emissions from the stack shall achieve an outlet emission rate of not greater than 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases **or** there shall be no visible emissions from the exhaust stack.

Applicable Compliance Method:

If required, compliance with the requirement for no visible particulate emissions from the exhaust stack, identified in this permit, shall be determined in accordance with U.S. EPA Method 22. If opting to comply with the outlet particulate emissions rate, compliance with the 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases from the stack shall be determined in accordance with U.S. EPA Methods 1 through 5, as appropriate.

e. Emission Limitation:

PE shall not exceed 0.551 lb/hr

Applicable Compliance Method:

Compliance with the emission limitation shall be determined by using the following equation:

$$E = (B) * (EF) * (100\% - CE) * (1 \text{ day/operating hours})$$

where,

E = emissions rate, lb/hr

B = number of batches per day, batches/day

EF = uncontrolled PE emissions factor, 2.03 lb/batch (Garland Mass Balance Study, 1/14/2009)

CE = control efficiency, $(99\% * 99.5\%) / (100\%) = 98.50\%$

If required by the Ohio EPA or CDAQ, compliance with the allowable particulate emissions limit shall be determined in accordance with U.S. EPA Reference Methods 1 through 5 or 40 CFR Part 60, Appendix A.

(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 3 months after issuance of the permit.
- b. The emission testing shall be conducted to demonstrate pounds VOC per pounds of material produced.
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

Method 25 or Method 25A

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

- d. The test(s) shall be conducted while at least two or more of the emissions units from this emissions units group (Coatings Operation) are operating at or near its maximum capacity and producing the material with the highest VOC content, unless otherwise specified or approved by the CDAQ.
- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the CDAQ. 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 CDAQ's refusal to accept the results of the emission test(s).
- f. Personnel from the CDAQ 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 CDAQ 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 CDAQ.

g) Miscellaneous Requirements

(1) These emissions unit were installed in 1940.