



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL MODIFICATION
ASHTABULA COUNTY**

CERTIFIED MAIL

Street Address:

50 West Town Street, Suite 700

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 02-14792

Fac ID: 0204010285

DATE: 4/10/2008

Plasticolors, Inc
Edward Trenn
PO Box 816
Ashtabula, OH 44005-0816

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

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

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

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA

NEDO



Permit To Install
Terms and Conditions

Issue Date: 4/10/2008
Effective Date: 4/10/2008

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 02-14792

Application Number: 02-14792
Facility ID: 0204010285
Permit Fee: **\$500**
Name of Facility: Plasticolors, Inc
Person to Contact: Edward Trenn
Address: PO Box 816
Ashtabula, OH 44005-0816

Location of proposed air contaminant source(s) [emissions unit(s)]:
2600 Michigan Ave
Ashtabula, Ohio

Description of proposed emissions unit(s):
Administrative modification of PTI 02-14792, issued 7/17/01, for equipment and operations changes at P028.

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described source(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon

Plasticolors, Inc
PTI Application: 02-14792
Modification Issued: 4/10/2008

Facility ID: 0204010285

the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

Plasticolors, Inc
PTI Application: 02-14792
Modification Issued: 4/10/2008

Facility ID: 0204010285

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

10. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

**SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Current Tons Per Year</u>	<u>Revised Tons Per Year</u>	<u>Net Change Tons Per Year</u>
OC	7.3	0.97	-6.33
PE	1.5	1.5	0.00

7

Plasticolors, Inc
PTI Application: 02 14702
Modif

Facility ID: 0204010285

Emissions Unit ID: P028

Plasti

PTI A

Modification Issued: 4/10/2008

Emissions Unit ID: P028

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P028 - Solvated Cellulose Acetate Butyrate (CAB) dispersion production: a solvating mix tank MT-32 with a fabric filter (DC007) to control the PE rate; a vertical mill SM020; a holding tank MT-31; a thinning tank MT-34; and a packaging station.	OAC rule 3745-31-05(A)(3)	The particulate emissions (PE) shall not exceed 0.34 lb/hr and 1.5 tons/year. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1).
	OAC rule 3745-31-05(C)	The organic compound (OC) emissions shall not exceed 0.97 ton/year.
	OAC rule 3745-21-07(M)(3)(C)(ii)	This emissions unit is not subject to the control requirements of OAC rules 3745-21-07(M)(3)(a) and 3745-21-07(M)(3)(b) since the potential, uncontrolled OC emissions are no more than 40 lbs/day.
	OAC rule 3745-17-11	The requirements of this rule are less stringent than the requirements of OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions shall not exceed 20% opacity, as a

Plasti**PTI A****Modification Issued: 4/10/2008**Emissions Unit ID: **P028**

6-minute average, except as provided by rule.

2. Additional Terms and Conditions**2.a** None**B. Operational Restrictions**

1. A dust control device with an efficiency of at least 99 percent shall be employed to control particulate matter emissions.

C. Monitoring and/or Recordkeeping Requirements

1. 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 serving this emissions unit. 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:
 - a. the 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.

2. The permit to install for this emissions unit (P028) was evaluated based on the actual

Modification Issued: 4/10/2008

materials (typically coatings and clean-up materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following table summarizes the results of the modeling for the "worst case" pollutant:

Pollutant: Toluene

TLV: 188.4 mg/m³ or 188,400 ug/m³

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration: 225.1 ug/m³

MAGLC = (TLV/42): 4,485.7 ug/m³

3. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

4. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA Northeast District Office by January 31 and July 31 of each year and shall cover the previous six-month periods.
2. The permittee may, upon receipt of written approval from the Ohio EPA Northeast District Office, 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. Testing Requirements

1. Compliance with the allowable emissions limitations and control measures requirements in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:

Modification Issued: 4/10/2008

- a. Emission Limitation: Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method: Compliance shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9, .

- b. Emission Limitation: The PE rate shall not exceed 0.34 lb/hr.
Applicable Compliance Method: Compliance may be based upon the following equation:

Determination of the maximum, controlled, hourly PE rate:

$$PE(HR) = V/\text{batch} \times 1/\text{batch-feed time} \times D \times SC \times EF \times (1 - CE).$$

where:

PE(HR) = maximum, controlled hourly PE rate, which is 0.15 lb PE/hr.

V = maximum volume of materials fed to solvating tank (MT-32), which is 1,200 gallons/batch, as specified in the application to modify PTI 02-14792.

batch-feed time = minimum time to feed (and mix) solid materials, which is 1 hour feed/batch, as specified in the application to modify PTI 02-14792.

D = density of dispersed materials processed at the solvating tank (MT-32), which is 8 lbs/gal as specified in the application to modify PTI 02-14792.

SC = maximum solids content, which is 0.16 lb solid/lb material as specified in the application to modify PTI 02-14792.

EF = emissions factor, which is 20 lbs uncontrolled PE/2,000 lbs solids for dry goods handling from Table 6.4-1 in AP-42 Chap. 6.4 (5/83), for paint & varnish manufacturing.

CE = efficiency of control device, which is 0.99 (99%), as specified in the application to modify PTI 02-14792.

The hourly PE rate limitation of 0.34 lb/hr is greater than or equal to the potential to emit for this emissions unit, taking into account the operating restriction to use any applicable air pollution control equipment. Therefore, no record keeping, deviation reporting or compliance method calculations are required to demonstrate compliance with this limitation.

- c. Emission Limitation: The PE rate shall not exceed 1.5 tons/year.

Applicable Compliance Method: Compliance may be based on the following equation :

Determination of the maximum, controlled, annual PE rate:

$$PE(YR) = PE(HR) \times \text{batch-feed time} \times 1/\text{batch-total time} \times 8,760 \text{ Hrs/Yr} \times \text{ton PE}/2,000 \text{ lbs PE.}$$

where:

$$PE(YR) = \text{maximum, controlled, annual PE rate, which is } 0.008 \text{ ton/yr.}$$

batch-total time = 84 hrs/batch, as specified in the application to modify PTI 02-14792.

Hrs/Yr = maximum annual, operating hours, 8,760 hrs/yr.

- d. Emission Limitation: The OC rate shall not exceed 0.97 ton/year.

Applicable Compliance Method: Potential annual emissions may be estimated by the following equations:

- i. Determination of potential, controlled emissions from all operations:

$$OC(YR) = [OC(\text{Batch Solvating}) + OC(\text{Batch Holding}) + OC(\text{Batch Thinning}) + OC(\text{Batch Packaging})] \text{lbs/batch} \times \text{batch/hrs} \times \text{yr}/8,760 \text{ hrs} \times \text{ton OC}/2,000 \text{ lbs OC.}$$

where:

$$OC(YR) = \text{maximum, controlled, annual OC rate, which is } 0.97 \text{ ton/yr.}$$

batch-total time = 84 hrs/batch, as specified in the application to modify PTI 02-14792.

OC(Batch Solvating) = potential, controlled OC emissions from dispersing solid materials in liquid solvent at the solvating tank, MT-32, which is 1.10 lbs OC/batch, as determined from the equations specified in section E.1.d.ii. through E.1.d.iv.

OC(Batch Holding) = potential, controlled OC emissions from holding a solid-liquid dispersion at the holding tank, MT-31, which is 0.46 lb OC/batch, as determined from the equations specified in section E.1.d.ii.

through E.1.d.iv.

OC(Batch Thinning) = potential, controlled OC emissions from thinning a solid-liquid dispersion with a solvent at the thinning tank, MT-34, which is 8.27 lbs OC/batch, as determined from the equations specified in section E.1.d.ii. through E.1.d.iv.

OC(Batch Packaging) = potential, uncontrolled OC emissions from packaging solid-liquid dispersion products at the packaging operation, which is 8.78 lbs OC/batch, as determined from the equations specified in section E.1.d.ii. through E.1.d.iv.

The annual OC limitation of 0.97 ton/yr is greater than or equal to the potential to emit for this emissions unit. Therefore, no record keeping, deviation reporting or compliance method calculations are required to demonstrate compliance with this limitation.

- ii. Determination of the potential OC emissions from materials loading:

$$EOC_LOAD = 12.46 \times S \times P \times M \times Q/T \times \text{Batch/Hrs} \times (1 - CE).$$

where:

EOC_LOAD = OC emissions, lbs OC/batch, from equation 8.4-1, p. 8.4-4, section 4.1, EIIP (Emission Inventory Improvement Program), Vol. II, Chap. 8 Methods for Estimating Air Emissions from Paint, Ink and Other Coating Manufacturing Facilities (2/05).

12.46 = equilibrium constant, °R/(psia x lb/lb-mole x 1,000 gal.)

S = saturation factor, dimensionless, see AP-42 Table 5.2-1, 1.45 for splash loading.

P = vapor pressure of material, in psia.

M = weighted average vapor molecular weight, lb/lb-mole.

Q = maximum volume of material loaded/hour, specified volume gal/1,000 gal.

T = temperature of loaded material, °R, specified temperature in °F + 460.

Hrs/batch = Maximum hours of the loading operation.

CE = control efficiency of conservation vent, 40% from AP-42 Table 4.2.2.7-1 (9/88) for the fixed roof tanks: solvating tank (MT-32), holding tank (MT-31) and thinning tank (MT-34).

- iii. Determination of the gas phase mass transfer coefficient to estimate emissions from surface evaporation during mixing:

$$K = 0.00438 \times U^{0.78} \times (18/M)^{1/3}$$

where:

K = gas phase mass transfer coefficient for OC species, ft/sec, from equation 8.4-21, p. 8.4-20, section 4.4, EIIP (Emission Inventory Improvement Program), Vol. II, Chap. 8 Methods for Estimating Air Emissions from Paint, Ink and Other Coating Manufacturing Facilities (2/05).

U = wind speed, miles/hr, 0.1 miles/hr.

M = average weighted vapor molecular weight, lb/lb-mole.

- iv. Determination of the potential, controlled daily OC emissions from surface evaporation during mixing (and milling):

$$EOC_MIX = M \times K \times A \times P \times 3600 / (R \times T) \times \text{Batch/Hrs} \times (1 - CE)$$

where:

EOC_MIX = OC emissions, lbs OC/batch, from equation 8.4-22, p. 8.4-22, section 4.4, EIIP (Emission Inventory Improvement Program), Vol. II, Chap. 8 Methods for Estimating Air Emissions from Paint, Ink and Other Coating Manufacturing Facilities (2/05).

M = vapor molecular weight, lb/lb-mole.

A = surface area of exposure or opening of conservation vent, ft².

P = vapor pressure of material, psia.

3600 = 3600 sec/hr.

R = universal gas constant at 1 atmosphere of pressure, 10.73 psia x ft³/(°R x lb-mole).

T = maximum temperature of loaded material, °R, specified temperature °F + 460.

Hrs = Maximum hours of the mixing (and milling) operation.

Plasti**PTI A****Modification Issued: 4/10/2008**Emissions Unit ID: **P028****F. Miscellaneous Requirements**

1. This emissions unit is involved in the manufacture of pigment dispersions. The permittee does not produce coatings, as defined in 40 CFR 63.8105, and is therefore not subject to the New Emissions Standards for Hazardous Air Pollutants for Miscellaneous Coating Manufacturing, 40 CFR, Part 63, Subpart HHHHH.
2. The terms and conditions contained in this permit for this emissions unit shall supersede all the air pollution control requirements for the emissions unit contained in the permit to install PTI 02-14792 issued on July 17, 2001.
3. Pulse jet baghouse (DC007) also controls the particulate emissions from the following emissions units: P008, P010, P013, P015, P023, P024, P030, P032 and P033.
4. The following emissions units located at this facility, including any de minimis air contaminant sources, as defined in OAC rule 3745-15-05, and any permanent exemption air contaminant sources installed subsequent to the issuance of this permit are subject to the rolling, 12-month emissions limitation(s) on VOCs, single HAPs and combined HAPs specified in PTI 02-22571, issued on February 26, 2008, but do not have operational restrictions for VOC nor HAP usages:

P027 - Hockmeyer CMX 100 Potwasher

P028 - Cellulose Acetate Butyrate (CAB) dispersion production;

T006 - 8,800 gallon storage tank for unsaturated polyester resin, tank no. 18;

T007 - 8,800 gallon storage tank for unsaturated polyester resin, tank no. 17;

T008 - 8,800 gallon storage tank for unsaturated polyester resin, tank no. 16;

T009 - 8,800 gallon storage tank for unsaturated polyester resin, tank no. 12;

T010 - 8,800 gallon storage tank for polyester polyol, tank no. 13;

T011 - 8,800 gallon storage tank for polyester resin/styrene, tank no. 14;

T012 - 8,800 gallon storage tank for polyester resin/styrene, tank no. 15;

T013 - 12,000 gallon storage tank for styrene monomer, tank no. 11;

T016 - 8,800 gallon storage tank for polyester resin/styrene, tank no. 26;

T017 - 8,800 gallon storage tank for polyester resin/styrene, tank no. 19; and

T018 - 8,800 gallon storage tank for polyester resin/styrene, tank no. 20.