

1/24/2011

Thomas DeVault
DAP Inc.
875 North Third Street
Tipp City, OH 45371-3014

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0855130356
Permit Number: P0106246
Permit Type: Renewal
County: Miami

Certified Mail

Yes	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, Troy Daily News. 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 Regional Air Pollution Control Agency
117 South Main Street
Dayton, OH 45422-1280

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 Regional Air Pollution Control Agency at (937)225-4435.

Sincerely,


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

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
RAPCA; Indiana



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

DAP Incorporated (DAP) operates a paint and adhesives manufacturing facility in Tipp City (Miami County), Ohio. An identification of the emissions units currently operating at DAP is listed in the tables attached to this permit strategy write-up. DAP currently operates a major source subject to Title V operating permit requirements and has applied for a Federally Enforceable Permit To Install and Operate to avoid renewing their Title V permit that expired on February 26, 2008.

3. Facility Emissions and Attainment Status:

DAP is located in Miami County, which is in attainment with all current National Ambient Air Quality Standards. DAP is currently a major source subject to Title V operating permit requirements with potential uncontrolled Volatile Organic Compound (VOC) emissions of approximately 230 tons per year. Potential VOC emission from DAP are summarized in the tables that are attached to this permit strategy write-up.

Assuming that DAP could substitute Hazardous Air Pollutants (HAP) for many of the VOCs that are in use, DAP is potentially a major of HAP emissions with individual HAP emissions in excess of 10 tons and combined HAP emissions in excess of 25 tons per year. DAP has already implemented record keeping and monitoring measures that show that their actual HAP emissions are below major source thresholds on a rolling 12-month basis as part of their initial Title V permit.

4. Source Emissions:

The 230 tons of potential VOC emissions from DAP consist of 191 tons from sources that currently have air emissions permits and 39.6 tons from de minimis or permit exempt emissions units. The potential VOC emissions from DAP are summarized in the two tables attached to this permit strategy write-up. DAP has elected to accept federally enforceable restrictions on the permitted emissions units that will limit the VOC emissions from permitted sources to 36.7 tons per rolling 12-month period in order to avoid renewing their Title V permit. These emissions limitations will be maintained by using the water and/or glycol condensers that reduce VOC emissions from many of the emissions units and limiting production on others. The 36.7 tons per rolling 12-month period combined with the 39.6 tons of potential VOC emissions from the de minimis or permit exempt emissions units will limit facility wide VOC emissions to no more than 76.3 tons per rolling 12-month period and preclude the requirement to comply with Title V permitting requirements.

Similarly DAP will continue to comply with the federally enforceable limits on HAP emissions that are currently in the expired Title V permit. Since the initial Title V permit was issued in February 2003, DAP has maintained records that demonstrate individual HAP emissions are less than 9.9 tons and combined HAP emissions are less than 24.9 tons per rolling 12-month period.



5. Conclusion:

By accepting federally enforceable restriction on VOC (76.3 tons per rolling 12-month period), individual HAP (9.9 tons per rolling 12-month period), and combined HAP (24.9 tons per rolling 12-month period) DAP will not need to be subject to compliance with Title V operating permit requirements.

6. Please provide additional notes or comments as necessary:

See tables 1. and 2. attached to this write-up for a summary of the VOC emissions at DAP.

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

<u>Pollutant</u>	<u>Tons Per Year</u>
<u>VOC</u>	<u>36.7</u>
<u>Individual HAP</u>	<u>9.9</u>
<u>Combined HAP</u>	<u>24.9</u>



Table 1. DAP, Inc., VOC Emissions from Permitted Emissions Units

Emissions Unit (EU) Group	EU ID	EU Description	Potential To Emit (PTE) (tons per year)	Synthetic Minor Limit (tons per rolling 12-month period)
Permitted Emissions Units				
Permitted paint mixers	P005	Let-down tanks numbered 220-231	3.2	5.60
	P012	No. 1 and 2 Cowles Small Paint Mixers	5.6	
	P014	No. 4 Cowles 450 gal Paint Mixer	1.16	
	P015	No. 5 Cowles 450 gal Paint Mixer	1.16	
	P016	No. 6 Cowles 450 gal Paint Mixer	1.16	
DAPtex charger	P040	DAPtex Charger	2.82	2.82
Aerosol Charger	P050	Aerosol Charger	2.62	2.62
Adhesive Mixers	P020	MM1 Mastics Mixer No. 1	2.87	4.56
	P021	MM2 Mastics Mixer No. 2	2.87	
	P022	CM1 Contact Cement Mixer No. 1	1.69	
	P023	CM2 Contact Cement Mixer No. 2	1.69	
Adhesive WIP Tanks	P024	WIP Tank A	6.5	7.5
	P025	WIP Tank B	6.5	
	P026	WIP Tank C	6.5	
	P027	WIP Tank D	6.5	
	P028	WIP Tank E	6.5	
	P029	WIP Tank F	6.5	
	P030	WIP Tank G	6.5	
	P031	WIP Tank H	6.5	
	P032	WIP Tank I	6.5	
	P033	WIP Tank J	6.5	
	P034	WIP Tank K	6.5	
	P035	WIP Tank L	6.5	
	P036	WIP Tank M	6.5	
Adhesive Packaging Lines	P041	Large Elgin Can Filler	11.4	8.00
	P042	Small Elgin Can Filler	11.4	
	P043	55 Gallon Drum Filler	11.4	
	P044	5-Gallon Pail Filler	11.4	
	P045	4-Stem Prosys Filler	11.4	
	P046	3-Stem Prosys Filler	11.4	
Storage Tanks	T027	12,000 gallon AST	1.0	5.6
	T028	12,000 gallon AST	2.3	
	T029	12,000 gallon AST	2.3	
	T030	12,000 gallon AST	2.1	
	T031	12,000 gallon AST	3.2	
Total			190.7	36.7
Total from De minimis/exempt sources			39.6	39.6
Total			230.3	76.3



Table 2. DAP, Inc., Potential VOC Emissions from De minimis or Permit Exempt Emissions Units

Emissions Unit (EU) Group	EU ID	EU Description	Potential To Emit (PTE) (tons per year)
De minimis Emissions Units			
F703, F704, F705, F706		Sand Mills	7.2
	P017	Mixer 215	0.41
	P018	Mixer 216	0.41
De minimis paint mixers	P708	DAPtex Pre-Stage Mixer	1.83
	P715	Paint Mixer 7	1.83
	P716	Paint Mixer 8	1.83
Paint filling lines	P011	Aerosol Filling Line	0.47
Paint filling lines (de minimis)	P712	Flecto Gallon fill line	0.54
	P713	Flecto Quart fill line	0.54
Varathane Tanks (de minimis)	T717	F1 Varathane Tank	1.04
	T718	F2 Varathane Tank	1.04
	T719	F3 Varathane Tank	1.04
	T720	F4 Varathane Tank	1.04
	T721	F5 Varathane Tank	1.04
	T722	F6 Varathane Tank	1.04
	T723	W1 Varathane Tank	1.04
	T724	W2 Varathane Tank	1.04
	T725	W3 Varathane Tank	1.04
	T726	W4 Varathane Tank	1.04
Plant wide Solvent Cleaning	P700	Plant wide Solvent Cleaning	3.50
Plant wide Equipment Leaks	P701	Plant wide Piping Components	3.50
De minimis Adhesive Mixers	P717	Myers Mixer LM-1	0.22
	P718	Myers Mixer LM-2	0.22
Adhesive Packaging Lines - De minimis	P711	Hand Fill 55 gallon drums	1.5
	P704	Packaging Line 1 and 3oz	0.27
Storage Tanks	P714	DAPtex	0.81
	T702	Tank 6A Lactol spirits tank	0.2
	T703	Tank 7A Mineral spirits tank	0.68
	T704	Tank 7B VM&P naphtha tank	0.68
	T706	Tank 8B MEK storage tank	0.51
	T712	Spensol tank	0.85
	T713	Rhoplex tank	0.57
DAPtex heat boxes	P722	DAPtex heat boxes	0.5
QC Spray Booth	R001	QC Spray Booth	0.22
Total			39.6

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install and Operate
DAP Inc.

Issue Date: 1/24/2011

Permit Number: P0106246

Permit Type: Renewal

Permit Description: Federally Enforceable renewal PTIO for DAP, Inc. to avoid Title V and MACT. Permit covers storage tanks, adhesive mixers controlled by condensers, aerosol chargers, bag dump stations, let down tanks, paint mixers, product packaging, and work in progress tanks.

Facility ID: 0855130356

Facility Location: DAP Inc.
875 North Third Street,
Tipp City, OH 45371-3014

Facility Description: Paint and Coating Manufacturing

Scott J. Nally, 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 Andrew Weisman at Regional Air Pollution Control Agency, 117 South Main Street or (937)225-4435. 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
DAP Inc.**

Facility ID:	0855130356
Permit Number:	P0106246
Permit Type:	Renewal
Issued:	1/24/2011
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
DAP Inc.

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Authorization

Facility ID: 0855130356

Application Number(s): A0038215, A0040724

Permit Number: P0106246

Permit Description: Federally Enforceable renewal PTIO for DAP, Inc. to avoid Title V and MACT. Permit covers storage tanks, adhesive mixers controlled by condensers, aerosol chargers, bag dump stations, let down tanks, paint mixers, product packaging, and work in progress tanks.

Permit Type: Renewal

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

Issue Date: 1/24/2011

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:

DAP Inc.
875 North Third Street
Tipp City, OH 45371-3014

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:

Regional Air Pollution Control Agency
117 South Main Street
Dayton, OH 45422-1280
(937)225-4435

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

Scott J. Nally
Director



Authorization (continued)

Permit Number: P0106246
Permit Description: Federally Enforceable renewal PTIO for DAP, Inc. to avoid Title V and MACT. Permit covers storage tanks, adhesive mixers controlled by condensers, aerosol chargers, bag dump stations, let down tanks, paint mixers, product packaging, and work in progress tanks.

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

Emissions Unit ID: P039
Company Equipment ID: Powdered Mineral Silo, controlled by Z040A
Superseded Permit Number: 08-04233
General Permit Category and Type: Not Applicable

Group Name: ASTs

Emissions Unit ID:	T027
Company Equipment ID:	TK2 Toluene Storage Tank
Superseded Permit Number:	08-03642
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T028
Company Equipment ID:	TK-03 12,000-gallon Textile Spirits Storage Tank
Superseded Permit Number:	08-03642
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T029
Company Equipment ID:	TK-04 12,000-gallon Textile Spirits Storage Tank
Superseded Permit Number:	08-03642
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T030
Company Equipment ID:	TK-01 12,000-gallon Acetone Storage Tank
Superseded Permit Number:	08-04307
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T031
Company Equipment ID:	TK 6B - Methylene Chloride Storage Tank
Superseded Permit Number:	08-04307
General Permit Category and Type:	Not Applicable

Group Name: Adhesive Mixers - Contact Cement

Emissions Unit ID:	P022
Company Equipment ID:	CM1 Contact Cement Mixer No. 1
Superseded Permit Number:	08-03642
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P023
Company Equipment ID:	CM2 Contact Cement Mixer No. 2
Superseded Permit Number:	08-03642
General Permit Category and Type:	Not Applicable

Group Name: Adhesive Mixers - Mastic

Emissions Unit ID:	P020
Company Equipment ID:	MM1 Mastics Mixer No. 1
Superseded Permit Number:	08-03642
General Permit Category and Type:	Not Applicable

Draft Permit-to-Install and Operate

DAP Inc.

Permit Number: P0106246**Facility ID:** 0855130356**Effective Date:** To be entered upon final issuance

Emissions Unit ID:	P021
Company Equipment ID:	MM2 Mastics Mixer No. 2
Superseded Permit Number:	08-03642
General Permit Category and Type:	Not Applicable

Group Name: Aerosol Chargers

Emissions Unit ID:	P040
Company Equipment ID:	Daptex Charger for charging aerosol cans with propelant
Superseded Permit Number:	08-04233
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P050
Company Equipment ID:	Aerosol Charger for charging aerosol cans w/ propellant
Superseded Permit Number:	08-04233
General Permit Category and Type:	Not Applicable

Group Name: Bag Dump Stations

Emissions Unit ID:	P047
Company Equipment ID:	CC1 Mixer Powdered Mineral Bag Dump Station
Superseded Permit Number:	08-04233
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P048
Company Equipment ID:	Mastics Mixer Powdered Bag Dump Station
Superseded Permit Number:	08-04233
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P049
Company Equipment ID:	CC2 Mixer Powdered Mineral Bag Dump Station
Superseded Permit Number:	08-04233
General Permit Category and Type:	Not Applicable

Group Name: Let Down Tanks

Emissions Unit ID:	P005
Company Equipment ID:	Let-down tanks numbered 220-231
Superseded Permit Number:	08-04233
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P012
Company Equipment ID:	No. 1 and 2 Cowles Small Paint Mixers
Superseded Permit Number:	08-04233
General Permit Category and Type:	Not Applicable

Group Name: Paint Mixers -

Emissions Unit ID:	P014
Company Equipment ID:	No. 4 Cowles 450 gal Paint Mixer
Superseded Permit Number:	08-04307
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P015
Company Equipment ID:	No. 5 Cowles 450 gal Paint Mixer
Superseded Permit Number:	08-04307
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P016
Company Equipment ID:	Mixer No.6
Superseded Permit Number:	08-04307
General Permit Category and Type:	Not Applicable

Group Name: Product Packaging - Adhesives

Emissions Unit ID:	P041
Company Equipment ID:	Large Elgin Can Filler

Superseded Permit Number:	08-04233
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P042
Company Equipment ID:	Small Elgin Can Filler
Superseded Permit Number:	08-04233
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P043
Company Equipment ID:	55-Gallon Drum Filler
Superseded Permit Number:	08-04233
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P044
Company Equipment ID:	5-Gallon Pail Filler
Superseded Permit Number:	08-04233
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P045
Company Equipment ID:	4-Stem Prosys Filler
Superseded Permit Number:	08-04233
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P046
Company Equipment ID:	3-Stem Prosys Filler
Superseded Permit Number:	08-04233
General Permit Category and Type:	Not Applicable

Group Name: Work In Progress (WIP) Tanks

Emissions Unit ID:	P024
Company Equipment ID:	TK A WIP Tank
Superseded Permit Number:	08-04137
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P025
Company Equipment ID:	TK B WIP Tank
Superseded Permit Number:	08-04137
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P026
Company Equipment ID:	TK C WIP Tank
Superseded Permit Number:	08-04137
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P027
Company Equipment ID:	TK D WIP Tank
Superseded Permit Number:	08-04137
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P028
Company Equipment ID:	TK E WIP Tank
Superseded Permit Number:	08-04137
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P029
Company Equipment ID:	TK F WIP Tank
Superseded Permit Number:	08-04137
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P030
Company Equipment ID:	TK G WIP Tank
Superseded Permit Number:	08-04137
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P031
Company Equipment ID:	TK H WIP Tank
Superseded Permit Number:	08-04137
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P032

Draft Permit-to-Install and Operate

DAP Inc.

Permit Number: P0106246

Facility ID: 0855130356

Effective Date: To be entered upon final issuance

Company Equipment ID:	TK I WIP Tank
Superseded Permit Number:	08-04137
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P033
Company Equipment ID:	TK J WIP Tank
Superseded Permit Number:	08-04137
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P034
Company Equipment ID:	TK K WIP Tank
Superseded Permit Number:	08-04137
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P035
Company Equipment ID:	TK L WIP Tank
Superseded Permit Number:	08-04137
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P036
Company Equipment ID:	TK M WIP Tank
Superseded Permit Number:	08-04137
General Permit Category and Type:	Not Applicable

Draft Permit-to-Install and Operate

DAP Inc.

Permit Number: P0106246

Facility ID: 0855130356

Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions

1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. 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 Regional Air Pollution Control Agency 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 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

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).

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.

Draft Permit-to-Install and Operate

DAP Inc.

Permit Number: P0106246

Facility ID: 0855130356

Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) Sections B.2. through B.10.

2. The combined VOC emissions from the emissions unit groups identified below shall not exceed the rolling 12-month limitations listed in the following table:

	Emissions Unit Identification Numbers	Emissions Unit/Emissions Unit Group Description	Rolling 12-Month VOC Emissions Limitation (tons per year)
a)	P005, P012, P014, P015, P016,	Paint Mixers	5.60
b)	P020, P021, P022, P023	Adhesive Mixers	4.56
c)	P024, P025, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036	Work In Progress (WIP) Tanks	7.50
d)	P040, P050	Aerosol Chargers	5.44
e)	P041, P042, P043, P044, P045, P046	Adhesive Packaging lines	8.00
f)	T027, T028, T029, T030, T031	Above Ground Storage Tanks	5.60

3. The permittee shall collect and record the following information each month for each emissions unit group listed in the table [2.a) through 2.f)], above:
 - a) The VOC emission rate for each emissions unit, in tons, (the sum of the daily VOC emissions rates calculated according to Section C. the Emissions Units Terms and Conditions for each emissions unit divided by 2,000 lb/ton);
 - b) The combined VOC emission rate for each emissions unit group, in tons, (the sum of the monthly VOC emissions rates for all the emissions units in each emissions unit group));
 - c) The rolling 12-month VOC emissions rate, in tons, for each or emissions unit group (the sum of the VOC emissions calculated according to 3.b) for the previous 12-months).

These emissions units have been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month emissions rates, upon issuance of this permit.

4. The permittee shall submit quarterly deviation (excursion) reports, in accordance with the Standard Terms and Conditions of this permit, of the following information:
 - a) An identification of each month during which the rolling, 12-month VOC emissions rate from the emissions unit groups listed in 2.a) through 2.f) exceeds its rolling 12-month emissions limit and the actual rolling, 12-month VOC emissions rate for that month.

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, 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). 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.
5. The emissions of hazardous air pollutants (HAPs), as defined in Section 112(b) of Title III of the Clean Air Act, from all the emissions units at this facility, shall not exceed 9.9 TPY for any individual HAP, as a rolling, 12-month sum, and 24.9 TPY for any combination of HAPs, as a rolling 12-month sum.
6. The following calculations shall be performed for each batch of paint and adhesive that is processed at the facility:
 - a) The HAP emissions from material additions (displacement losses) to the paint and adhesive mixers (emissions units P012, P014, P015, P016, P017, P018, P020, P021, P022, and P023) and from transfers to the let-down tanks (emissions unit P005), work-in-progress tanks (emissions units P024, P025, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, and P036), and packaging equipment (emissions units P041, P042, P043, P044, P045, and P046) shall be calculated according to 10.a).
 - b) The HAP emissions due to surface evaporation from the paint and adhesive mixers (emissions units P012, P014, P015, P016, P017, P018, P020, P021, P022, and P023), let-down tanks (emissions unit P005), and work-in-progress tanks (emissions units P024, P025, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, and P036) shall be calculated according to 10.b).
 - c) The HAP emissions from heat-up caused by internal friction (no heat is applied and no exothermic reactions occur) during the mixing process in the paint and adhesive mixers (emissions units P012, P014, P015, P016, P017, P018, P020, P021, P022, and P023) and let-down tanks (emissions unit P005), shall be calculated according to 10.c).
 - d) For any emissions unit that has a condenser, the actual emission rate shall be determined by multiplying the uncontrolled HAP emission rate (calculated according to 6.a), 6.b) or 6.c)) by the control efficiency determined according to a condenser design evaluation completed according to the equations found in 40 CFR 63.1257(d) as follows:

- (1) 76% for the chilled water condensers and non-methylene-chloride formulations on emissions unit P022 and P023 (sum of uncontrolled HAP emissions x (1-0.76)),
 - (2) 99% for the combination of chilled water and glycol condensers with an activated carbon canister (with a removal efficiency of 18 pounds of methylene chloride per 180 pounds of activated carbon as specified by the activated carbon manufacturer) for methylene-chloride formulations on emissions unit P023 (sum of uncontrolled HAP emissions x (1-0.99)).
 - (3) 82% for chilled water condensers on emissions units P020 and P021 (sum of uncontrolled HAP emissions x (1-0.82)),
 - (4) 75% for the glycol condensers on emissions units P024 - P036 (sum of uncontrolled HAP emissions x (1-0.75)).
- e) The HAP emissions from bulk liquid storage of raw materials shall be calculated using the latest version of the U.S. EPA, TANKS program or equivalent calculations from U.S. EPA publication AP-42, Chapter 7 on a monthly basis.
7. The permittee shall keep records for the entire facility each month of the following information:
- a) The identification of each HAP processed.
 - b) The quantity, in pounds or tons, of each HAP processed.
 - c) The quantity, in pounds or tons, of all the HAPs processed.
 - d) The total facility-wide emissions (and associated calculations) for each individual HAP, in tons, (calculated by the sum of the individual HAP emission rates from all the emissions units at the facility calculated according to 6.a) through 6.d)).
 - e) The total facility-wide emissions (and associated calculations) for all combined HAPs, in tons, (calculated by summing all combined HAPs emission rates from all the emissions units at the facility calculated according to 6.a) through 6.d)).
 - f) The rolling 12-month sum of the total individual HAP emissions rates for each HAP from all the emissions units at the facility, in tons (the sum of individual HAP emissions rates calculated according to 6.d) for the previous 12 months).
 - g) The rolling 12-month sum of the total combined HAP emissions rates from all the emissions units at the facility, in tons, (the sum of combined HAP emissions rates calculated according to 6.e) for the previous 12 months).
8. The permittee shall submit quarterly deviation (excursion) reports, in accordance with Part I of the Standard Terms and Conditions, of this permit, of the following information:
- a) An identification of each month during which the rolling, 12-month individual HAP emissions rate (from the facility) exceeded 9.9 tons, and the actual rolling, 12-month sum of each individual HAP emissions rate (from the facility) for each such month.

- b) An identification of each month during which the rolling, 12-month combination of all HAP emissions rates (from the facility) exceeded 24.9 tons, and the actual rolling, 12-month sum of the combination of all HAP emissions rates (from the facility) for each such month.

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, 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). 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.

9. The permittee shall submit annual reports that summarize the annual emissions of each individual HAP and the combined emissions of all the HAPs for the facility. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Synthetic Minor Title V Fee Emission Report.
10. The determination of VOC and organic HAP emissions, in pounds, from the displacement, evaporation, heat up losses from mixing and/or point source losses for each batch of solvent based adhesive or coating/paint processed shall be determined in accordance with the formulas and assumptions listed below. (Reference: derivation of all the following equations can be found in "US EPA Emission Inventory Improvement Program (EIIP) Volume II: Chapter 8, Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Facilities", updated February 2005).

- a) Displacement losses shall be determined according to equation 8.4-1:

$$E_d = 0.01246 \times ((S \times P \times MW \times Q) \div T)$$

where:

E_d = Vapor displacement losses due to material transfer (lb/batch)

P = vapor pressure of material loaded (psia)

S = saturation factor, dimensionless, 1.0, on the basis that the vapor space is saturated with vapors, submerged fill

MW = vapor molecular weight (lb/lb-mole)

Q = volume of material loaded (gallons)

T = temperature ($^{\circ}$ R)

- b) Evaporation losses shall be determined according to equation 8.4-22:

$$E_e = (MW \times K \times A \times P \times 3,600 \times H) \div (R \times T)$$

where:

E_e = Vapor loss due to evaporation (lb/batch)

MW = Vapor Molecular Weight (lb/lb-mole)

$K = (0.00438) \times (U^{0.78}) \times [(18/MW)^{0.33}]$, gas phase mass transfer coefficient (ft/sec)

$U = 0.1$ mile per hour, from USEPA's example for indoor equipment

A = open area of tank (ft²)

P = vapor pressure pure chemical or partial pressure of chemical for mixture (psia)

3600 = 3,600 seconds/hour

H = Batch Time (hours/batch)

R = universal gas constant, [(10.73 psia)(ft³)/(lb-mole)(°R)]

- c) Heat up losses shall be determined according to equation 8.4-10:

$$E_H = \{[(P_x)_{T_1} \div (14.7 - \sum(P_x)_{T_1})] + [(P_x)_{T_2} \div [(14.7 - \sum(P_x)_{T_2})] \div 2] \} \times n \times MW$$

where:

E_H = Vapor loss due to temperature increase during processing (lb/batch)

$(P_x)_{T_1}$ = partial pressure of each VOC in vessel head space at initial gas temperature (psia)

$(P_x)_{T_2}$ = partial pressure of each VOC in vessel head space at final gas temperature (psia)

n = lb-moles of gas displaced, [(V/R)x($P_{a1}/T_1 - P_{a2}/T_2$)]

V = vessel head space (ft³)

P_{a1} = initial gas pressure in vessel (psia), calculated as (14.7 - $P_x T_1$)

P_{a2} = final gas pressure in vessel (psia), calculated as (14.7 - $P_x T_2$)

R = universal gas constant, [(10.73 psia)(ft³)/(lb-mole)(°R)]

T_1 = initial gas temperature (°R)

T_2 = final gas temperature (°R)

MW = Vapor Molecular Weight (lb/lb-mole)

- d) Point source losses shall be determined according to the following equation:

$$E_p = (E_d) \times (Q_{ex}) \times (T_{ex}) \div (Batch\ volume)$$

where:

E_p = point source loss (lb/day)

E_d = Vapor displacement losses due to material transfer (lb/batch)

Q_{ex} = volumetric exhaust rate (24.23 gallons/minute)

T_{ex} = the length of time the exhaust fan is running during dry material addition (assume 5 minutes per batch)

11. The Ohio EPA has determined that this facility is subject to the requirements of 40 CFR part 63 Subpart CCCCCC, National Emissions Standards for Hazardous Air Pollutants: Area Source Standards for Paints and Allied Products Manufacturing. Although Ohio EPA has determined that this area source MACT (also known as the GACT) applies, at this time Ohio EPA does not have the authority to enforce this standard. Instead, U.S. EPA has the authority to enforce this standard. Please be advised, that all requirements associated with this rule are in effect and shall be enforced by U.S. EPA.

Draft Permit-to-Install and Operate

DAP Inc.

Permit Number: P0106246

Facility ID: 0855130356

Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions

1. P039, Powdered Mineral Silo, controlled by Z040A

Operations, Property and/or Equipment Description:

Powdered Mineral Silo, controlled by fabric filter identified as Z040A

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. None.

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(A)(3)	The particulate emissions from this emissions unit shall not exceed 0.02 grain per dry standard cubic foot of exhaust, 0.08 pound per hour and 0.33 ton per year. See b)(2)a. and b)(2)b.
b.	OAC rule 3745-17-07(A)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3)
c.	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3)

(2) Additional Terms and Conditions

- a. The emissions from this emissions unit shall be vented to the baghouse at all times the emissions unit is in operation.
- b. Visible particulate emissions from the stack serving this emissions unit shall not exceed zero percent (0%) opacity as a six-minute average.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the baghouse is between 1 to 3 inches of water.
- (2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

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

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

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

- a. a description of the corrective action;
- b. the date corrective action was completed;

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

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

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

e) Reporting Requirements

- (1) The permittee shall identify in the annual PER the following information concerning the operations of the baghouse during the 12-month reporting period for this/these emissions unit(s):
 - a. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the acceptable range;
 - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse;
 - c. each incident of deviation described in "a" (above) where a prompt investigation was not conducted;
 - d. each incident of deviation described in "a" where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - e. each incident of deviation described in "a" where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

Unless other arrangements have been approved by the Director, the PER shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal

f) Testing Requirements

(1) Compliance with the emission limitation(s) in b)(1) of these terms and conditions shall be determined in accordance with the following method(s):

a. Emission Limitation-

The particulate emissions from this emissions unit shall not exceed 0.02 grain per dry standard cubic foot.

Applicable Compliance Method-

If requested, compliance shall be determined by stack testing in accordance with OAC rule 3745-17-03(B)(10) and U.S. EPA Reference Method 5.

b. Emission Limitation-

The particulate emissions from this emissions unit shall not exceed 0.08 pound per hour.

Applicable Compliance Method-

If requested, compliance shall be determined by stack testing in accordance with OAC rule 3745-17-03(B)(10) and U.S. EPA Reference Method 5.

c. Emission Limitation-

The particulate emissions from this emissions unit shall not exceed 0.33 ton per year.

Applicable Compliance Method-

Compliance shall be determined by multiplying the maximum hourly allowable emission rate of 0.08 pound per hour times the actual, annual hours of operation, and divided by 2,000 lb/ton.

d. Emission Limitation-

Visible particulate emissions from the stack serving this emissions unit shall not exceed zero percent (0%) opacity as a six-minute average.

Applicable Compliance Method-

If requested, compliance shall be determined by visible emissions evaluations conducted according to the procedures specified in U.S. EPA Reference Method 22.

g) Miscellaneous Requirements

(1) None.

2. Emissions Unit Group - ASTs: T027, T028, T029, T030, T031,

EU ID	Operations, Property and/or Equipment Description
T027	12,000 gallon toluene above ground storage tank
T028	12,000 gallon hexane storage tank
T029	12,000 gallon hexane above ground storage tank
T030	12,000 gallon vertical fixed roof acetone storage tank (TK-01)
T031	6,000 gallon vertical fixed roof methylene chloride storage tank (TK 6B)

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. d)(4) through d)(7).

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)b. and b)(2)a.

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(A)(3)	<p><u>Emissions Unit T027</u> - The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 1.0 ton per year.</p> <p><u>Emissions Unit T028 and T029</u> - The VOC emissions from each of these emissions units shall not exceed 2.30 tons per year.</p> <p><u>Emissions Unit T030</u> - The VOC emissions from this emissions unit shall not exceed 2.14 tons per year.</p> <p><u>Emissions unit T031</u> - The VOC or methylene chloride emissions from this</p>

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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		emissions unit shall not exceed 3.19 tons per year. See b)(2)b.
b.	OAC rule 3745-31-05(D) Synthetic minor to avoid Title V	See b)(2)a., b)(2)b., and Sections B.2.through B.10.
c.	OAC rule 3745-21-09(L)	See b)(2)c.
d.	OAC rule 3745-114-01 and ORC 3704.03(F)	See d)(4) through d)(7).

(2) Additional Terms and Conditions

- a. The combined VOC emissions from emissions units T027, T028, T029, T030 and T031 shall not exceed 5.60 tons per rolling 12-month period. The record keeping and reporting requirements necessary to comply with the synthetic minor potential emissions limitation are identified in Section B.2. through B.10. of this permit.
- b. Each storage tank shall be loaded by means of a submerged fill pipe.
- c. In accordance with OAC rule 3745-21-09(L)(2), these storage tanks are exempt from the requirements of OAC rule 3745-21-09(L)(1) because each tank has a capacity of less than 40,000 gallons.

c) Operational Restrictions

- (1) The annual throughput of textile spirits in emissions unit T028 and T029 shall not exceed 3,441,585 gallons per year, per tank.
- (2) The annual throughput of VOC liquids in emissions unit T030 shall not exceed 4,380,000 gallons per year.
- (3) The VOC liquids stored in emissions unit T030 shall not have a vapor pressure greater than acetone.
- (4) The annual throughput of methylene chloride in emissions unit T031 shall not exceed 2,190,000 gallons per year.
- (5) The VOC liquids stored in emissions unit T031 shall not have a vapor pressure greater than methylene chloride.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall keep readily accessible records showing the dimension of the storage vessels and an analysis showing the capacity of the storage vessels for the life of the sources.

- (2) The permittee shall perform annual inspections of the white paint finish of the storage tanks and make repairs, when necessary, to maintain the white tank finish in good condition.
- (3) The permittee shall maintain monthly records of:
 - a. the identification of each liquid stored; and
 - b. the volume, in gallons, of each liquid throughput in each tank.
- (4) The permit to install for emissions units T028, T029, T030 and T031 were evaluated based on the actual materials (typically coatings and cleanup 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 (or other Ohio EPA approved 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 summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: 2-Methylpentane (hexane isomer)

TLV (mg/m³): 1,762

Maximum Hourly Emission Rate (lb/hr): 0.76.

Predicted 1-Hour Maximum Ground-Level Concentration (µg/m³): 675

MAGLC (µg/m³): 41,961

Pollutant: Acetone

TLV (mg/m³): 1,187

Maximum Hourly Emission Rate (lb/hr): 0.49

Predicted 1-Hour Maximum Ground-Level Concentration (µg/m³): 434

MAGLC (µg/m³): 28,265

Pollutant: Methylene Chloride

TLV (mg/m³): 174

Maximum Hourly Emission Rate (lb/hr): 0.70

Predicted 1-Hour Maximum Ground-Level Concentration (µg/m³): 1,294

MAGLC (µg/m³): 4,135

- (5) 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 still 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 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.).
- (6) 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.
- (7) 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.
- e) Reporting Requirements
- (1) The permittee shall submit annual reports that identify any exceedances of the annual throughput limitation. These reports shall be submitted by January 31 of each year. The reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.
 - (2) The permittee shall submit annual reports that specify the total VOC emissions from these emissions units for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Synthetic Minor Title V Fee Emission Report.
 - (3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

- (4) 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.

f) Testing Requirements

- (1) Compliance with the emission limitation in b)(1) and b)(2) of these terms and conditions shall be determined in accordance with the following method:

- a. Emission Limitation-

The VOC emissions shall not exceed:

- i. 1.00 ton per year for emissions unit T027;
- ii. 2.30 tons per year for emissions unit T028;
- iii. 2.30 tons per year for emissions unit T029;
- iv. 2.14 tons per year for emissions unit T030;
- v. 3.19 tons per year for emissions unit T031

Applicable Compliance Method-

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(3), and the formulas provided in AP-42 Chapter 7, Organic Liquid Storage Tanks, Section 7.1.3.1., Total Losses from Fixed Roof Tanks (9/1997) or the latest version of the U.S. EPA "Tanks" software program..

- b. Emission Limitation –

The combined VOC emissions from emissions units T027, T028, T029, T030 and T031 shall not exceed 5.60 tons per rolling 12-month period.

Applicable Compliance Method –

Compliance shall be based upon the record keeping requirements of Section B.3. of this permit.

g) Miscellaneous Requirements

- (1) None.

3. Emissions Unit Group - Adhesive Mixers - Contact Cement: P022, P023,

EU ID	Operations, Property and/or Equipment Description
P022	Contact Cement Mixer No. 1 (CCM1) with chilled water condenser
P023	Contact Cement Mixer No. 2 (CCM2) with chilled water condenser, chilled glycol condenser and activated carbon drum

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)b., b)(2)a., c)(1) through c)(4), d)(1) through d)(3), e)(1) and f)(1)c.

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(A)(3)	<u>Emissions Units P022 and P023:</u> The volatile organic compound (VOC) emissions from each emissions unit shall not exceed 30.4 pounds/day and 1.69 tons per year.
b.	OAC rule 3745-31-05(D) Synthetic minor to avoid Title V	See b)(2)a. and Section B.2. through B.10.

(2) Additional Terms and Conditions

a. The combined VOC emissions from emissions units P020, P021, P022 and P023 shall not exceed 4.56 tons per rolling 12-month period. The record keeping and reporting requirements necessary to comply with this synthetic minor potential emissions limitation are identified in Section B.2. through B.10. of this permit.

c) Operational Restrictions

- (1) The average temperature of the exhaust gases from the chilled water condensers, for any 3-hour block of time shall not exceed 57 °F.
- (2) The permittee shall only process methylene chloride formulations in emissions unit P023.
- (3) When processing methylene chloride formulations, the average temperature of the exhaust gases from the chilled glycol condenser, for any 3-hour block of time shall not exceed 23 °F.
- (4) The permittee shall install and operate a new 180-lb activated carbon canister for tertiary air emissions control prior to processing each batch of methylene chloride formulations in emissions unit P023.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information on a daily basis for this emissions unit:
 - a. The company identification for each batch of product mixed.
 - b. The volume, in gallons, of each batch mixed.
 - c. The calculated vapor pressure of the material produced in each batch (psia).
 - d. The calculated vapor molecular weight of the material produced in each batch (lb/lb-mole).
 - e. The average temperature of the mixer when in operation (°R).
 - f. The batch time (hours/batch).
 - g. The open area of the mixer (square feet).
 - h. The partial pressure of each VOC in each mixer head space (psia).
 - i. The calculated gas vapor pressure in each mixer (psia).
 - j. The average initial and final gas temperatures (°R).
 - k. The determination of the displacement, evaporation, and heat up VOC losses mixed/stored in the mixer for each batch, in pounds, according to the equations listed in Section B.10.a), B.10.b) and B.10.c) of this permit.
 - l. The total calculated uncontrolled VOC emission rate for this emissions unit (the sum of the displacement, evaporation, and heat up VOC losses for all batches), in pounds.
 - m. The total calculated controlled VOC emission rate for this emissions unit, in pounds:

- i. the value in l. multiplied by 1 minus the overall condenser control efficiency determined by the condenser design evaluation conducted according to equations in 40 CFR 63.1257(d).
 - (a) 76% for chilled water condensers and non-methylene-chloride formulations ($l \times (1-0.76)$),
 - (b) 99% for the combination of chilled water and glycol condensers with an activated carbon canister (with a removal efficiency of 18 pounds of methylene chloride per 180 pounds of activated carbon as specified by the activated carbon manufacturer) for methylene-chloride formulations ($l \times (1-0.99)$).
 - n. The identification number of each new carbon canister that is installed prior to processing each batch of methylene chloride formulations in emissions unit P023.
 - o. Identification of any products mixed in either of these emissions units that contain methylene chloride.
- (2) The permittee shall operate and maintain a continuous temperature monitor and recorder that measures and records the temperature of the exhaust gases from the condenser when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within +/- 1 percent of the temperature being measured or +/-5°F, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.
- (3) The permittee shall collect and record the following information each day for the condenser:
- a. The average temperature of the exhaust gases from the condenser during each of the eight 3-hour blocks of time during the day.
 - b. A log or record of the downtime for the capture (collection) system, control device, and monitoring equipment when the associated emissions unit was in operation.
- e) Reporting Requirements
- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
- a. An identification of each day during which the VOC emission rate from the production of mastic materials exceeded 30.4 pounds per day, and the actual VOC emissions for each such day.
 - b. An identification of all 3-hour blocks of time during which the average temperature of the exhaust gases from the condenser exceeded the temperature limitations specified in c)(1) or c)(3).

- c. A log of all times when the condensers and/or monitoring equipment were not operating when the emissions unit was in operation.
- d. An identification of any day during which methylene chloride formulations were processed in an emissions unit other than P023.
- e. An identification of any day when methylene chloride formulations were manufactured in emissions unit P023 and a new carbon canister was not installed prior to manufacturing.

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, 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). 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 annual reports that specify the total VOC emissions from these emissions units for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Synthetic Minor Title V Fee Emission Report.
- (3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (4) 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.

f) **Testing Requirements**

- (1) Compliance with the emission limitations in b)(1) and b)(2) shall be determined in accordance with the following method(s):
 - a. Emission Limitation –
The VOC emissions from each emissions unit shall not exceed 30.4 pounds/day.
 - Applicable Compliance Method –
Compliance shall be based upon the record keeping requirements of d)(1).

b. Emission Limitation –

The VOC emissions from each emissions unit shall not exceed 1.69 tons per year.

Applicable Compliance Method –

Compliance shall be based upon the record keeping requirements of d)(1) and sum of the daily VOC emissions rates for each year, in pounds, divided by 2000 pounds per ton.

c. Emission Limitation –

The combined VOC emissions from emissions units P020, P021, P022 and P023 shall not exceed 4.56 tons per rolling 12-month period.

Applicable Compliance Method –

Compliance shall be based upon the record keeping requirements of Section B.3. of this permit.

g) Miscellaneous Requirements

(1) None.

4. Emissions Unit Group - Adhesive Mixers - Mastic: P020, P021,

EU ID	Operations, Property and/or Equipment Description
P020	Mastics Mixer No. 1 (MM1) with chilled water condenser
P021	Mastics Mixer No. 2 (MM2) with chilled water condenser

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

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

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(A)(3) PTI 08-3642	<u>Emissions Units P020 and P021:</u> The volatile organic compound (VOC) emissions from each emissions unit shall not exceed 38.1 pounds/day and 2.87 tons per year.
b.	OAC rule 3745-31-05(D) Synthetic minor to avoid Title V	See b)(2)a. and Section B.2. through B.10.

(2) Additional Terms and Conditions

a. The combined VOC emissions from emissions units P020, P021, P022 and P023 shall not exceed 4.56 tons per rolling 12-month period. The record keeping and reporting requirements necessary to comply with this synthetic minor potential emissions limitation are identified in Section B.2. through B.10. of this permit.

c) Operational Restrictions

- (1) The average temperature of the exhaust gases from the chilled water condensers, for any 3-hour block of time shall not exceed 62 °F.
- (2) The permittee shall not process methylene chloride formulations in these emissions units.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information on a daily basis for this emissions unit:
 - a. The company identification for each batch of product mixed.
 - b. The volume, in gallons, of each batch mixed.
 - c. The calculated vapor pressure of the material produced in each batch (psia).
 - d. The calculated vapor molecular weight of the material produced in each batch (lb/lb-mole).
 - e. The average temperature of the mixer when in operation (°R).
 - f. The batch time (hours/batch).
 - g. The open area of the mixer (square feet).
 - h. The partial pressure of each VOC in each mixer head space (psia).
 - i. The calculated gas vapor pressure in each mixer (psia).
 - j. The average initial and final gas temperatures (°R).
 - k. The determination of the displacement, evaporation, and heat up VOC losses mixed/stored in the mixer for each batch, in pounds, according to the equations listed in Section B.7.a), B.7.b) and B.7.c) of this permit.
 - l. The total calculated before-control VOC emission rate for this emissions unit [the sum of the displacement, evaporation, and heat up VOC losses for all batches], in pounds.
 - m. The total calculated controlled VOC emission rate for this emissions unit, in pounds:
 - i. the value in (l) multiplied by 1 minus the overall condenser control efficiency determined by the condenser design evaluation conducted according to equations in 40 CFR 63.1257(d).
 - (a) 82% for chilled water condensers and non-methylene-chloride formulations ($l \times (1-0.82)$),

- n. Identification of any products mixed in any of these emissions units that contain methylene chloride.
- (2) The permittee shall operate and maintain a continuous temperature monitor and recorder that measures and records the temperature of the exhaust gases from the condenser when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within +/- 1 percent of the temperature being measured or +/-5°F, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.
- (3) The permittee shall collect and record the following information each day for the condensers:
- a. The average temperature of the exhaust gases from the condenser during each of the eight 3-hour blocks of time during the day.
 - b. A log or record of the downtime for the capture (collection) system, control device, and monitoring equipment when the associated emissions unit was in operation.
- e) Reporting Requirements
- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
- a. An identification of each day during which the VOC emission rate from the production of mastic materials exceeded 38.1 pounds per day, and the actual VOC emissions for each such day.
 - b. An identification of all 3-hour blocks of time during which the average temperature of the exhaust gases from the condenser exceeded the temperature limitation specified in c)(1).
 - c. a log of all times when the condensers and/or monitoring equipment were not operating when the emissions unit was in operation.
 - d. An identification of each day during which methylene chloride formulations were processed in these emissions units.

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, 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). 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 annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Synthetic Minor Title V Fee Emission Report.
 - (3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
 - (4) 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.
- f) Testing Requirements
- (1) Compliance with the emission limitations in b)(1) and b)(2) shall be determined in accordance with the following method(s):
 - a. Emission Limitation –
The VOC emissions from each emissions unit shall not exceed 38.1 pounds/day.
Applicable Compliance Method –
Compliance shall be based upon the record keeping requirements of d)(1).
 - b. Emission Limitation –
The VOC emissions from each emissions unit shall not exceed 2.87 tons per year.
Applicable Compliance Method –
Compliance shall be based upon the record keeping requirements of d)(1) and sum of the daily VOC emissions rates calculated according to d)(1), in pounds, divided by 2000 pounds per ton.
 - c. Emission Limitation –
The combined VOC emissions from emissions units P020, P021, P022 and P023 shall not exceed 4.56 tons per rolling 12-month period.
Applicable Compliance Method –
Compliance shall be based upon the record keeping requirements of Section B.3. of this permit.

Draft Permit-to-Install and Operate

DAP Inc.

Permit Number: P0106246

Facility ID: 0855130356

Effective Date: To be entered upon final issuance

g) Miscellaneous Requirements

(1) None.

5. Emissions Unit Group - Aerosol Chargers: P040, P050,

EU ID	Operations, Property and/or Equipment Description
P040	DAPtex Charger for the charging of aerosol cans with propellant
P050	Aerosol Chager for the Charging of Aerosol Cans with Propellant

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

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

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(A)(3)	<u>Emissions Unit P040</u> – The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 1.05 pounds per hour, 16.8 pounds per day and 2.82 tons per year <u>Emissions Unit P050</u> – The VOC emissions from this emissions unit shall not exceed 0.60 pound per hour, 14.4 pounds per day and 2.62 tons per year
b.	OAC rule 3745-31-05(D) Synthetic minor to avoid Title V	See b)(2)a. and Section B.2. through B.10.

(2) Additional Terms and Conditions

a. The combined VOC emissions from emissions units P040 and P050 shall not exceed 5.44 tons per rolling 12-month period. The record keeping and reporting

requirements necessary to comply with this synthetic minor potential emissions limitation are identified in Section B.2. through B.10. of this permit.

c) Operational Restrictions

- (1) The quantity of cans filled on emissions unit P040 (DAPtex charger) shall not exceed 29,468,640 cans per rolling twelve month period.
- (2) The quantity of cans filled on emissions unit P050 (aerosol charger) shall not exceed 54,750,000 cans per rolling twelve month period.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each day for each emissions unit:
 - a. the number of cans filled;
 - b. the density of the propellant employed in the Daptex charger;
 - c. the number of hours of operation.
 - d. the total VOC emissions from emissions unit P040 (DAPtex charger), in pounds, calculated as follows.
 - i. divide the density of each propellant charged in the Daptex charging process (lb/gallon), from d)(1)a. above, by the conversion factor of 3785.41 cubic centimeters (cc)/gallon
 - ii. multiply the result from d.i above by an VOC loss factor of 0.16 cc/can (this will result in a lb-VOC/can emission factor;
 - iii. multiply d.ii. by the number of cans filled;
 - iv. sum the results from d.iii above for all the propellants charged;
 - v. divide iv by the number of hours the emissions unit was in operation (from d)(1)c. above)
 - e. the total VOC emissions from emissions unit P050 (aerosol charger), in pounds, calculated as follows.
 - i. divide the density of each propellant charged in the Daptex charging process (lb/gallon), from d)(1)a. above, by the conversion factor of 3785.41 cubic centimeters (cc)/gallon
 - ii. multiply the result from d.i above by an VOC loss factor of 0.08 cc/can (this will result in a lb VOC/can emission factor;
 - iii. multiply d.ii. by the number of cans filled;
 - iv. sum the results from d.iii above for all the propellants charged;

v. divide iv by the number of hours the emissions unit was in operation

(2) The permittee shall collect and record the following information each month:

- a. The quantity of cans filled on the DAPtex charger each month; (the of the daily records collected according to d)(1)a. for each month).
- b. The rolling 12-month total of cans charged on the DAPtex charger (the sum of the records collected according to d)(2)a. for the previous 12 months).
- c. The quantity of cans filled on the aerosol charger each month; (the of the daily records collected according to d)(1)a. for each month).
- d. The rolling 12-month total of cans charged on the aerosol charger (the sum of the records collected according to d)(2)a. for the previous 12 months).

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. for emissions unit P040, an identification of each month where the 28,468,640 cans per rolling 12-month period production limitation was exceeded.
 - b. for emissions unit P050, an identification of each month where 54,750,000 cans per rolling 12-month period production limitation was exceeded.

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, 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). 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 annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Synthetic Minor Title V Fee Emission Report.
- (3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

- (4) 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.

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1) and b)(2) shall be determined in accordance with the following method(s):

- a. Emission Limitation –

The VOC emissions from emissions shall not exceed:

- i. 1.05 pounds per hour for emissions unit P040;
- ii. 0.60 pound per hour for emissions unit P050.

Applicable Compliance Method –

Compliance shall be based upon the record keeping requirements of d)(1).

- b. Emission Limitation –

The VOC emissions from emissions shall not exceed:

- i. 16.8 pounds per day for emissions unit P040;
- ii. 14.4 pounds per day for emissions unit P050.

Applicable Compliance Method –

Compliance shall be based upon the record keeping requirements of d)(1).

- c. Emission Limitation –

The VOC emissions from emissions shall not exceed:

- i. 2.82 tons per year for emissions unit P040;
- ii. 2.62 tons per year for emissions unit P050;

Applicable Compliance Method –

Compliance shall be based upon sum of the daily VOC emissions rates calculated according to d)(1) for each year, in pounds, divided by 2000 lb/ton.

- d. Emission Limitation –

The combined VOC emissions from emissions units P040 and P050 shall not exceed 5.44 tons per rolling 12-month period.

Draft Permit-to-Install and Operate

DAP Inc.

Permit Number: P0106246

Facility ID: 0855130356

Effective Date: To be entered upon final issuance

Applicable Compliance Method –

Compliance shall be based upon the record keeping requirements of Section B.3. of this permit.

g) Miscellaneous Requirements

(1) None.

6. Emissions Unit Group - Bag Dump Stations: P047, P048, P049,

EU ID	Operations, Property and/or Equipment Description
P047	CC1 Mixer Powdered Mineral Bag Dump Station
P048	Mastic Mixer Powdered Mineral Bag Dump Station
P049	CC2 Mixer Powdered Mineral Bag Dump Station

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. None.

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(A)(3)	<u>Emissions Units P047, P048 and P049</u> - The particulate emissions from this emissions unit shall not exceed 0.20 pound per hour and 0.30 ton per year. The opacity of the visible particulate emissions from this emissions unit shall not exceed 5% opacity, as a 6-minute average.
b.	OAC rule 3745-17-07(A)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-1711(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

- a. The particulate emissions from this emissions unit shall be vented to the baghouse at all times the emissions unit is in operation.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the baghouse is between 1 to 6 inches of water.
- (2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

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

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

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

- a. a description of the corrective action;
- b. the date corrective action was completed;
- c. the date and time the deviation ended;
- d. the total period of time (in minutes) during which there was a deviation;

- e. the pressure drop readings immediately after the corrective action was implemented; and
- f. the name(s) of the personnel who performed the work.

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

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

e) Reporting Requirements

- (1) The permittee shall identify in the annual PER the following information concerning the operations of the baghouse during the 12-month reporting period for this/these emissions unit(s):
 - a. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the acceptable range;
 - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse;
 - c. each incident of deviation described in "a" (above) where a prompt investigation was not conducted;
 - d. each incident of deviation described in "a" where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - e. each incident of deviation described in "a" where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.
 - f. Unless other arrangements have been approved by the Director, the PER shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following method(s):

a. Emission Limitation –

The particulate emissions from emissions from each emissions unit shall not exceed 0.20 lb per hour.

Applicable Compliance Method –

Compliance shall be determined by multiplying the maximum amount of pigment which may be handled in this emissions unit each hour (1680 lb) by the AP-42 emissions factor of 20 pounds of particulate emissions/ton of pigment handled, Table 6.4-1 (1/95), dividing by 2000 lb/ton, and multiplying by the control efficiency of 99% (1-0.99).

If requested, compliance shall be demonstrated by stack testing according to the procedures outlined in OAC rule 3745-17-03(B)(10) and U.S. EPA Reference Method 5.

b. Emission Limitation –

The particulate emissions from emissions from each emissions unit shall not exceed 0.30 ton per year.

Applicable Compliance Method –

Compliance shall be determined by multiplying each 12-month summation of pigment handled by the AP-42 emission factor of 20 pounds of particulate emission/ton of pigment handled, Table 6.4-1 (1/95), dividing by 2000 lb/ton, and multiplying by the control efficiency of 99% (1-0.99)..

c. Emission Limitation –

The opacity of the visible particulate emissions from this emissions unit shall not exceed 5% opacity, as a 6-minute average.

Applicable Compliance Method –

If requested, compliance shall be demonstrated by stack testing according to the procedures outlined in OAC rule 3745-17-03(B)(1) and U.S. EPA Reference Method 9.

g) Miscellaneous Requirements

(1) None.

7. Emissions Unit Group - Let Down Tanks: P005, P012,

EU ID	Operations, Property and/or Equipment Description
P005	Let-down Paint Tanks 220, 221, 222, 227, and 229
P012	No. 1 and No. 2 Cowles Small Paint Mixers

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. d)(2) through d)(4).

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)b., b)(2)a., and f)(1)g.

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(A)(3)	<u>Emissions Unit P005:</u> The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 2.31 pounds per hour, 17.3 pounds per day and 3.20 tons per year. <u>Emissions Unit P012:</u> The VOC emissions from this emissions unit shall not exceed 1.28 pounds per hour, 30.7 pounds per day and 5.60 tons per year.
b.	OAC rule 3745-31-05(D) Synthetic minor to avoid Title V	See b)(2)a. and Section B.2. through B.10.
c.	OAC rule 3745-114-01 and ORC 3704.03(F)	See d)(2) through d)(4).

(2) Additional Terms and Conditions

- a. The combined VOC emissions from emissions units P005, P012, P014, P015 and P016 shall not exceed 5.60 tons per rolling 12-month period. The record keeping and reporting requirements necessary to comply with this synthetic minor potential emissions limitation are identified in Section B.2. through B.10. of this permit.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information on a daily basis for each paint tank associated with these emissions units:
 - a. the company identification for each batch of product mixed/stored;
 - b. the number of hours of operation;
 - c. the volume, in gallons, mixed/stored of each product;
 - d. the number of batches of each product mixed/stored;
 - e. the calculated vapor pressure (psia) of the product;
 - f. the calculated vapor molecular weight (lb/lb-mole) of each product;
 - g. the average temperature of each let-down tank when in operation (°R);
 - h. the open area of each tank (square feet);
 - i. the partial pressure of each VOC in each vessel head space (psia);
 - j. the calculated gas vapor pressure in each vessel (psia);
 - k. the average initial gas temperature (°R) and final gas temperature (°R);
 - l. The determination of the displacement, evaporation, and point source VOC losses mixed/stored in the mixer for each batch, in pounds, according to the equations listed in Section B.10.a), B.10.b) and B.10.d) of this permit.
 - m. the total calculated VOC emission rate for each emissions unit, in pounds;
 - i. for emissions unit P005 the sum of VOC emissions for all the let down tanks, 220, 221, 222, 227, and 229, combined, for all products;
 - ii. for emissions unit P012 the sum of VOC emissions for Cowles mixers 1 and 2 combined, for all products;
 - n. the average hourly VOC emission rate for each emissions unit d)(1)m. divided by d)(1)b.

- (2) The permit to install for this emissions units P014, P015 and P016 was evaluated based on the actual materials (typically coatings and cleanup 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 (or other Ohio EPA approved 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 summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: toluene

TLV (mg/m³): 188.4

Maximum Hourly Emission Rate (lb/hr): 4.23

Predicted 1-Hour Maximum Ground Level Concentration (µg/m³): 135.8

MAGLC (µg/m³): 4,485

Pollutant: methanol

TLV (mg/m³): 262.1

Maximum Hourly Emission Rate (lb/hr): 1.40

Predicted 1-Hour Maximum Ground Level Concentration (µg/m³): 46.1

MAGLC (µg/m³): 6,240

- (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 still 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 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.).
- d. 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.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
- a. For emissions unit P005, an identification of each day during which the average hourly VOC emissions from the mixing and/or storing of materials exceeded 2.31 pounds per hour, and the actual average hourly VOC emissions for each such day.
 - b. For emissions unit P005, an identification of each day during which the VOC emissions from the mixing and/or storing of materials exceeded 17.3 pounds per day, and the actual VOC emissions for each such day.
 - c. For emissions unit P012, an identification of each day during which the average hourly VOC emissions from the mixing and/or storing of materials exceeded 1.28 pounds per hour, and the actual average hourly VOC emissions for each such day.
 - d. For emissions unit P012, an identification of each day during which the VOC emissions from the mixing and/or storing of materials exceeded 30.7 pounds per day, and the actual VOC emissions for each such day.

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, 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). 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 annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Synthetic Minor Title V Fee Emission Report.
 - (3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
 - (4) 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.
- f) Testing Requirements
- (1) Compliance with the emission limitations in b)(1) and b)(2) shall be determined in accordance with the following methods:
 - a. Emission Limitation-

The VOC emissions from emissions unit P005 shall not exceed 2.31 pounds per hour.

Applicable Compliance Method-

Compliance shall be based upon the record keeping requirements of d)(1).
 - b. Emission Limitation-

The VOC emissions from emissions unit P005 shall not exceed 17.3 pounds per day.

Applicable Compliance Method-

Compliance shall be based upon the record keeping requirements of d)(1).
 - c. Emission Limitation-

The VOC emissions from emissions unit P005 shall not exceed 3.20 tons per year.

Applicable Compliance Method-

Compliance shall be based upon the record keeping requirements of d)(1) and shall be the sum of the daily VOC emission rates for the calendar year, divided by 2000.

d. Emission Limitation-

The VOC emissions from emissions unit P012 shall not exceed 1.28 pounds per hour.

Applicable Compliance Method-

Compliance shall be based upon the record keeping requirements of d)(1).

e. Emission Limitation-

The VOC emissions from emissions unit P012 shall not exceed 30.7 pounds per day.

Applicable Compliance Method-

Compliance shall be based upon the record keeping requirements of d)(1).

f. Emission Limitation-

The VOC emissions from emissions unit P012 shall not exceed 5.60 tons per year.

Applicable Compliance Method-

Compliance shall be based upon the record keeping requirements of d)(1) and shall be the sum of the daily VOC emission rates for the calendar year, divided by 2000.

g. Emission Limitation –

The combined VOC emissions from emissions units P005, P012, P014, P015 and P016 shall not exceed 5.60 tons per rolling 12-month period.

Applicable Compliance Method –

Compliance shall be based upon the record keeping requirements of Section B.3. of this permit.

g) Miscellaneous Requirements

(1) None.

8. Emissions Unit Group - Paint Mixers -: P014, P015, P016,

EU ID	Operations, Property and/or Equipment Description
P014	Cowles 450-gallon paint mixer No. 4
P015	Cowles 450-gallon paint mixer No. 5
P016	Cowles 450-gallon paint mixer No. 6

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. d)(4) through d)(6).

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)b., b)(2)a., and f)(1)d.

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(A)(3)	<u>Emissions Units P014, P015 and P016:</u> The VOC emissions from each emissions unit shall not exceed 0.53 pound per hour, 6.37 pounds per day and 1.16 tons per year. The particulate emissions from each emissions unit shall not exceed 0.069 pound per hour. Visible particulate emissions from the stack serving each emissions unit shall not exceed 5 percent opacity as a six-minute average.
b.	OAC rule 3745-31-05(D) Synthetic minor to avoid Title V	See b)(2)a. and Section B.2. through B.10.
c.	OAC Rule 3745 -17-11(B)(1)	The emissions limitation specified by this rule is less stringent than the emissions

Draft Permit-to-Install and Operate

DAP Inc.

Permit Number: P0106246

Facility ID: 0855130356

Effective Date: To be entered upon final issuance

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		limitation established by OAC rule 3745-31-05(A)(3).
c.	OAC Rule 3745-17-07(A)(1)	The emissions limitation specified by the rule is less stringent than the emissions limitation established by OAC rule 3745-31-05(A)(3).
d.	OAC rule 3745-114-01 and ORC 3704.03(F)	See d)(4) through d)(6).

(2) Additional Terms and Conditions

- a. The combined VOC emissions from emissions units P005, P012, P014, P015 and P016 shall not exceed 5.60 tons per rolling 12-month period. The record keeping and reporting requirements necessary to comply with this synthetic minor potential emissions limitation are identified in Section B.2. through B.10. of this permit.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information on a daily basis for each paint tank associated with these emissions units:
 - a. the company identification for each batch of product mixed/stored;
 - b. the number of hours of operation;
 - c. the volume, in gallons, mixed/stored of each product;
 - d. the number of batches of each product mixed/stored;
 - e. the calculated vapor pressure (psia) of the product;
 - f. the calculated vapor molecular weight (lb/lb-mole) of each product;
 - g. the average temperature of each let-down tank when in operation (°R);
 - h. the open area of each tank (square feet);
 - i. the partial pressure of each VOC in each vessel head space (psia);
 - j. the calculated gas vapor pressure in each vessel (psia);
 - k. the average initial gas temperature (°R) and final gas temperature (°R);

- l. the determination of the displacement, evaporation, and point source VOC losses mixed/stored in the mixer for each batch, in pounds, according to the equations listed in Section B.10.a), B.10.b) and B.10.d) of this permit.
 - m. the total calculated VOC emission rate for each emissions unit, in pounds;
 - i. for emissions unit P014 the sum of VOC emissions for Cowles mixer No. 4, for all products combined;
 - ii. for emissions unit P015 the sum of VOC emissions for Cowles mixer No. 5, for all products combined;
 - iii. for emissions unit P016 the sum of VOC emissions for Cowles mixer No. 6, for all products combined; and
 - n. the average hourly VOC emission rate for each emissions unit [d)(1)m. divided by d)(1)b.].
- (2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable pressure drop across the fabric filter has been established to be not less than 0.50 inches of water.
- (3) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the fabric filter when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the fabric filter on a daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

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

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

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

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

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

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

- (4) The permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup 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 (or other Ohio EPA approved 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 summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene

TLV (mg/m³): 188

Maximum Hourly Emission Rate (lb/hr): 1.5

Predicted 1-Hour Maximum Ground-Level Concentration (µg/m³): 490

MAGLC (µg/m³): 4,486

- (5) 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 still 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 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.).
 - d. 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.
- (6) 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.
- e) Reporting Requirements
- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
- a. An identification of each day during which the average hourly VOC emissions from the mixing and/or storing of materials exceeded 0.53 pound per hour, and the actual average hourly VOC emissions for each such day.
 - b. An identification of each day during which the VOC emissions from the mixing and/or storing of materials exceeded 6.37 pounds per day, and the actual VOC emissions for each such day.
 - c. each period of time (start time and date, and end time and date) when the pressure drop across the fabric filter was outside of the acceptable range;

- d. 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 fabric filter;
- e. each incident of deviation described in "a" (above) where a prompt investigation was not conducted;
- f. each incident of deviation described in "a" where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
- g. each incident of deviation described in "a" where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit

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, 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). 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 annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Synthetic Minor Title V Fee Emission Report.
 - (3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
 - (4) 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.
- f) Testing Requirements
- (1) Compliance with the emission limitations in b)(1) and b)(2) shall be determined in accordance with the following methods:
 - a. Emission Limitation-

The VOC emissions from each emissions unit shall not exceed 0.53 pound per hour.

Applicable Compliance Method-

Compliance shall be based upon the record keeping requirements of d)(1).

b. Emission Limitation-

The VOC emissions from each emissions unit shall not exceed 6.37 pounds per day.

Applicable Compliance Method-

Compliance shall be based upon the record keeping requirements of d)(1).

c. Emission Limitation-

The VOC emissions from each emissions unit shall not exceed 1.16 tons per year.

Applicable Compliance Method-

Compliance shall be based upon the record keeping requirements of d)(1) and shall be the sum of the daily VOC emission rates for the calendar year, divided by 2000.

d. Emission Limitation –

The combined VOC emissions from emissions units P005, P012, P014, P015 and P016 shall not exceed 5.60 tons per rolling 12-month period.

Applicable Compliance Method –

Compliance shall be based upon the record keeping requirements of Section B.3. of this permit.

e. Emission Limitation

The particulate emissions from each emissions unit shall not exceed 0.69 pound per hour.

Applicable Compliance Method

If requested, compliance shall be determined through visible emission observations performed in accordance with OAC rule 3745-17-03(B)(10) and U.S. EPA Reference Method 5.

f. Emission Limitation

Visible particulate emissions from any stack shall not exceed 5 percent opacity as a six-minute average.

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Applicable Compliance Method

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

g) Miscellaneous Requirements

(1) None.

9. Emissions Unit Group - Product Packaging - Adhesives: P041, P042, P043, P044, P045, P046,

EU ID	Operations, Property and/or Equipment Description
P041	Large Elgin Can Filler, Gallon Containers, Uncontrolled
P042	Small Elgin Can Filler - Mastics/Contact Cement Packaging Line, Uncontrolled
P043	55-Gallon Drum Filler, Adhesive Packaging Line, Uncontrolled
P044	5-Gallon Pail Filler, Adhesive Packaging Line, Uncontrolled
P045	4-Stem Prosys Filler, 10 oz. Tubes, Uncontrolled
P046	3-Stem Prosys Filler, 29 oz. Tubes, Uncontrolled

- 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. d)(2) through d)(4).
 - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - a. b)(1)b., b)(2)a., and f)(1)d.
- 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(A)(3)	<p><u>Emissions Unit P041:</u> The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 5.7 pounds per hour, 62.5 pounds per day and 8.00 tons per year.</p> <p><u>Emissions Unit P042:</u> The VOC emissions from this emissions unit shall not exceed 4.8 pounds per hour, 62.5 pounds per day and 8.00 tons per year.</p> <p><u>Emissions Unit P043:</u> The VOC emissions from this emissions unit shall not exceed 4.8 pounds per hour, 62.5 pounds per day and 8.00 tons per year.</p>

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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p><u>Emissions Unit P044:</u> The VOC emissions from this emissions unit shall not exceed 5.4 pounds per hour, 116 pounds per day and 8.00 tons per year.</p> <p><u>Emissions Unit P045:</u> The VOC emissions from this emissions unit shall not exceed 2.84 pounds per hour, 69.6 pounds per day and 8.00 tons per year.</p> <p><u>Emissions Unit P046:</u> The VOC emissions from this emissions unit shall not exceed 5.16 pounds per hour, 72.5 pounds per day and 8.00 tons per year.</p>
b.	OAC rule 3745-31-05(D) Synthetic minor to avoid Title V	See b)(2)a. and Section B.2. through B.10.
c.	OAC rule 3745-114-01 and ORC 3704.03(F)	See d)(2) through d)(4).

(2) Additional Terms and Conditions

- a. The VOC emissions from emissions units P041 through P046 combined shall not exceed 8.00 tons per rolling 12-month period. The record keeping and reporting requirements necessary to comply with this synthetic minor potential emissions limitation are identified in Section B.2. through B.10. of this permit.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information on a daily basis for each emissions units:
 - a. the company identification for each batch of product packaged;
 - b. the number of hours of operation;
 - c. the volume, in gallons, of each product packaged;
 - d. the number of batches of each product packaged;
 - e. the calculated vapor pressure (psia) of each product;
 - f. the calculated vapor molecular weight (lb/lb-mole) of each product;

- g. the average temperature of the product ($^{\circ}$ R);
- h. the determination of the VOC displacement losses for each batch of adhesives packaged, in pounds, according to the equations listed in Section B.10.a) of this permit.
- i. the total calculated VOC emission rate for each emissions unit, in pounds;
 - i. for emissions unit P041 the sum of VOC emissions for all products packaged;
 - ii. for emissions unit P042 the sum of VOC emissions for all products packaged;
 - iii. for emissions unit P043 the sum of VOC emissions for all products packaged;
 - iv. for emissions unit P044 the sum of VOC emissions for all products packaged;
 - v. for emissions unit P045 the sum of VOC emissions for all products packaged;
 - vi. for emissions unit P046 the sum of VOC emissions for all products packaged;
- j. the average hourly VOC emission rate for each emissions unit [d)(1)i. divided by d)(1)b.].

(2) The permit to install for this emissions unit was evaluated based on the actual materials specified by the permittee in the permit to install application. The emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worse case" each pollutant(s):

Pollutant: Toluene
TLV ($\mu\text{g}/\text{m}^3$): 188,400
Maximum Hourly Emission Rate (lb/hr): 4.23
Predicted 1-Hour Maximum Ground-Level Concentration ($\mu\text{g}/\text{m}^3$): 135.8
MAGLC ($\mu\text{g}/\text{m}^3$): 4485.0

Pollutant: MEK
TLV ($\mu\text{g}/\text{m}^3$): 589,770
Maximum Hourly Emission Rate (lb/hr): 1.0
Predicted 1-Hour Maximum Ground-Level Concentration ($\mu\text{g}/\text{m}^3$): 33.32
MAGLC ($\mu\text{g}/\text{m}^3$): 14,042

Pollutant: Hexane

TLV ($\mu\text{g}/\text{m}^3$): 176,200

Maximum Hourly Emission Rate (lb/hr): 3.79

Predicted 1-Hour Maximum Ground-Level Concentration ($\mu\text{g}/\text{m}^3$): 123

MAGLC ($\mu\text{g}/\text{m}^3$): 41,952

Pollutant: Methanol

TLV ($\mu\text{g}/\text{m}^3$): 262,090

Maximum Hourly Emission Rate (lb/hr): 1.4

Predicted 1-Hour Maximum Ground-Level Concentration ($\mu\text{g}/\text{m}^3$): 46.13

MAGLC ($\mu\text{g}/\text{m}^3$): 6,240

- (3) Physical changes to or changes in the method of operation of the emissions unit that 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 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 be 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.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

- a. an identification of each day during which the average hourly VOC emissions from packaging adhesives exceeded;
 - i. 5.7 pounds per hour for emissions unit P041, and the actual average hourly VOC emissions for each such day;
 - ii. 4.8 pounds per hour for emissions unit P042, and the actual average hourly VOC emissions for each such day;
 - iii. 4.8 pounds per hour for emissions unit P043, and the actual average hourly VOC emissions for each such day;
 - iv. 5.4 pounds per hour for emissions unit P044, and the actual average hourly VOC emissions for each such day;
 - v. 2.84 pounds per hour for emissions unit P045, and the actual average hourly VOC emissions for each such day;
 - vi. 5.16 pounds per hour for emissions unit P046, and the actual average hourly VOC emissions for each such day;
- b. an identification of each day during which the VOC emissions from packaging adhesives exceeded:
 - i. 62.5 pounds per day for emissions unit P041, and the actual VOC emissions for each such day;
 - ii. 62.5 pounds per day for emissions unit P042, and the actual VOC emissions for each such day;
 - iii. 62.5 pounds per day for emissions unit P043, and the actual VOC emissions for each such day;
 - iv. 116 pounds per day for emissions unit P044, and the actual VOC emissions for each such day;
 - v. 69.6 pounds per day for emissions unit P045, and the actual VOC emissions for each such day;
 - vi. 72.5 pounds per day for emissions unit P046, and the actual VOC emissions for each such day;

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, 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). 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 annual reports to the Director (local air agency) that summarize the total calculated controlled annual VOC emissions for each emissions unit and for emissions units P041 through P046, combined. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Synthetic Minor Title V Fee Emission Report.
- (3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (4) 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.

f) **Testing Requirements**

- (1) Compliance with the emission limitations in b)(1) and b)(2) shall be determined in accordance with the following methods:

a. **Emission Limitation-**

The VOC emissions from emissions shall not exceed:

- i. 5.7 pounds per hour for emissions unit P041;
- ii. 4.8 pounds per hour for emissions unit P042;
- iii. 4.8 pounds per hour for emissions unit P043;
- iv. 5.4 pounds per hour for emissions unit P044;
- v. 2.84 pounds per hour for emissions unit P045;
- vi. 5.16 pounds per hour for emissions unit P046;

Applicable Compliance Method-

Compliance shall be based upon the record keeping requirements of d)(1).

b. Emission Limitation-

The VOC emissions shall not exceed:

- i. 62.5 pounds per day for emissions unit P041;
- ii. 62.5 pounds per day for emissions unit P042;
- iii. 62.5 pounds per day for emissions unit P043;
- iv. 116 pounds per day for emissions unit P044;
- v. 69.6 pounds per day for emissions unit P045;
- vi. 72.5 pounds per day for emissions unit P046;

Applicable Compliance Method-

Compliance shall be based upon the record keeping requirements of d)(1).

c. Emission Limitation-

The VOC emissions shall not exceed:

- i. 8.00 tons per year for emissions unit P041;
- ii. 8.00 tons per year for emissions unit P042
- iii. 8.00 tons per year for emissions unit P043
- iv. 8.00 tons per year for emissions unit P044
- v. 8.00 tons per year for emissions unit P045
- vi. 8.00 tons per year for emissions unit P046.

Applicable Compliance Method-

Compliance shall be based upon the record keeping requirements of d)(1) and shall be the sum of the daily organic compound emission rates for the calendar year, divided by 2000.

d. Emission Limitation –

The VOC emissions from emissions units P041 through P046 combined shall not exceed 8.00 tons per rolling 12-month period.

Applicable Compliance Method –

Compliance shall be based upon the record keeping requirements of Section B.3. of this permit.

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g) Miscellaneous Requirements

(1) None.

10. Emissions Unit Group - Work In Progress (WIP) Tanks: P024, P025, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036

EU ID	Operations, Property and/or Equipment Description
P024	Product Storage Tank, WIP Tank A with chilled glycol condenser, contact cement
P025	Product Storage Tank, WIP Tank B with chilled glycol condenser, contact cement
P026	Product Storage Tank, WIP Tank C with chilled glycol condenser, contact cement
P027	Product Storage Tank, WIP Tank D with chilled glycol condenser, contact cement
P028	Product Storage Tank, WIP Tank E with chilled glycol condenser, contact cement
P029	Product Storage Tank, WIP Tank F with chilled glycol condenser, contact cement
P030	Product Storage Tank, WIP Tank G with chilled glycol condenser, contact cement
P031	Product Storage Tank, WIP Tank H with chilled glycol condenser, contact cement
P032	Product Storage Tank, WIP Tank I with chilled glycol condenser, contact cement
P033	Product Storage Tank, WIP Tank J with chilled glycol condenser, mastic adhesives
P034	Product Storage Tank, WIP Tank K with chilled glycol condenser, mastic adhesives
P035	Product Storage Tank, WIP Tank L with chilled glycol condenser, mastic adhesives
P036	Product Storage Tank, WIP Tank M with chilled glycol condenser, mastic adhesives

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. d)(5) through d)(7).

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)b. b)(2)b., c)(1) and c)(2), d)(1) through d)(4), e)(1)c., e)(1)d., f)(1)b and f)(1)d.

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(A)(3)	The volatile organic compound emissions (VOC) emissions from each WIP tank shall not exceed 36.0 pounds per day and 6.50 tons per year.

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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See b)(2)a.
b.	OAC rule 3745-31-05(D) Synthetic minor to avoid Title V	See b)(2)b. and Section B.2. through B.10.
c.	OAC rule 3745-114-01 and ORC 3704.03(F)	See d)(5) through d)(7).

(2) Additional Terms and Conditions

- a. The VOC emissions from emissions units P024 through P036 (WIP Tanks A through M), combined, shall not exceed 311 pounds per day.
- b. The VOC emissions from emissions units P024 through P036 (WIP Tanks A through M), combined, shall not exceed 7.50 tons per rolling 12-month period. The record keeping and reporting requirements necessary to comply with this synthetic minor potential emissions limitation are identified in Section B.2. through B.10. of this permit.

c) Operational Restrictions

- (1) The average temperature of the exhaust gases from the condenser, for any 3-hour block of time during which a batch was transferred, shall not be greater than 23.0 °F when processing methylene chloride formulations and not greater than 35.6 °F when processing other adhesive formulations.
- (2) Formulations containing methylene chloride shall be processed in only 2 work-in-progress tanks (Work-in-Progress Tanks A through M) at any one time.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each day for this emissions unit:
 - a. the company identification for each batch of adhesives;
 - b. the total number of gallons of each batch;
 - c. the calculated vapor pressure of the material produced (psia) in each batch;
 - d. the calculated molecular weight of the material produced (lb/lb-mole) in each batch;
 - e. the batch temperature (°R);
 - f. the batch time (hours/batch);
 - g. the open area of the tank (square feet);

- h. the determination of the displacement, and evaporation VOC losses for each batch in each tank, in pounds, according to the equations listed in Section B.10.a), and B.10.b) of this permit;
 - i. the sum of the displacement and evaporative losses of VOC, in pounds, for all the batches; and
 - j. the total calculated controlled VOC emissions, in pounds/day (the controlled VOC emission rate shall be calculated by multiplying the uncontrolled emissions rate by a control efficiency of 75%), i.e., (i) multiplied by a factor of (1- 0.75); and
 - k. documentation of whether or not the formulation components processed contain methylene chloride.
- (2) The permittee shall collect and record for each day the total calculated controlled VOC emission rate for emissions units P024 through P036, combined, in pounds [the sum of the daily VOC emission rates [d)(1)].] for emissions units P024 through P036] .
- (3) The permittee shall operate and maintain a continuous temperature monitor and recorder that measures and records the temperature of the exhaust gases from the condenser when the emissions unit is in operation. The temperature shall be recorded in degrees Fahrenheit. The continuous monitoring and recording devices shall be capable of accurately measuring the desired parameters. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.
- (4) The permittee shall collect and record the following information each day:
- a. The average temperature of the exhaust gases from the condenser during each of the 8 3-hour blocks of time during the day.
 - b. A log or record of the downtime for the capture (collection) system, control device, and monitoring equipment when the associated emissions unit was in operation.
- (5) The permit to install for this emissions unit was evaluated based on the actual materials specified by the permittee in the permit to install application. The emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worse case" each pollutant(s):

Pollutant: Toluene

TLV ($\mu\text{g}/\text{m}^3$): 188,000

Maximum Hourly Emission Rate (lb/hr): 4.5

Predicted 1-Hour Maximum Ground-Level Concentration ($\mu\text{g}/\text{m}^3$): 1,142

MAGLC ($\mu\text{g}/\text{m}^3$): 4,487

Pollutant: Hexane

TLV ($\mu\text{g}/\text{m}^3$): 1,762,370

Maximum Hourly Emission Rate (lb/hr): 12.0

Predicted 1-Hour Maximum Ground-Level Concentration ($\mu\text{g}/\text{m}^3$): 3045

MAGLC ($\mu\text{g}/\text{m}^3$): 4,200

Pollutant: Methylene Chloride

TLV ($\mu\text{g}/\text{m}^3$): 173,680

Maximum Hourly Emission Rate (lb/hr): 12

Predicted 1-Hour Maximum Ground-Level Concentration ($\mu\text{g}/\text{m}^3$): 3,587

MAGLC ($\mu\text{g}/\text{m}^3$): 4,135

- (6) 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 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 be 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.

- (7) 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.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. an identification of each day during which the total calculated controlled VOC emissions from any WIP Tank exceeded 36.0 lb/day, and the actual VOC emissions for each such day.
 - b. an identification of each day during which the controlled VOC emissions from WIP Tanks A through M combined exceeded 311 lb/day, and the total calculated controlled VOC emissions for each such day.
 - c. an identification of all 3-hour blocks of time during which the average temperature of the exhaust gases from the condenser exceeded the temperature limitation specified in c)(1).
 - d. an identification of each day that the processing of methylene chloride formulations occurred in more than 2 work-in-progress tanks.

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, 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). 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 annual reports to the Director (Ohio EPA district office or local air agency) that summarize the total calculated controlled annual VOC emissions for each emissions unit and for emissions units P024 through P036, combined. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Synthetic Minor Title V Fee Emission Report.
- (3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

- (4) The permittee shall submit quarterly summaries that include the following:
 - a. a log of the downtime for the capture (collection) system, control device, and monitoring equipment when the emissions unit was in operation.
 - b. an identification of all time periods during which formulation components containing methylene chloride were processed in more than two tanks.
- (5) 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.

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1) and b)(2) shall be determined in accordance with the following methods:
 - a. Emission Limitation-

The VOC emissions from each WIP tank shall not exceed 36.0 pounds per day.

Applicable Compliance Method-

Compliance with the daily VOC emission limitation shall be determined based upon the record keeping requirements specified in d)(1) of this permit.
 - b. Emission Limitation-

The VOC emissions from each WIP tank shall not exceed 6.50 tons per year.

Applicable Compliance Method-

Compliance with the annual VOC emission limitation shall be based upon the record keeping requirements specified in d)(1) and shall be the sum of the daily calculated organic compound emission rates for the calendar year, divided by 2000 pounds per ton.
 - c. Emission Limitation-

The VOC emissions from emissions units P024 through P036 (WIP Tanks A through M), combined, shall not exceed 311 pounds per day.

Applicable Compliance Method-

Compliance with the daily VOC emission limitation shall be determined based upon the record keeping requirements specified in d)(1) and d)(2).
 - d. Emission Limitation –

The VOC emissions from emissions units P024 through P036 (WIP Tanks A through M), combined, shall not exceed 7.50 tons per rolling 12-month period.

Draft Permit-to-Install and Operate

DAP Inc.

Permit Number: P0106246

Facility ID: 0855130356

Effective Date: To be entered upon final issuance

Applicable Compliance Method –

Compliance shall be based upon the record keeping requirements of Section B.3. of this permit.

g) Miscellaneous Requirements

(1) None.